

CITY AND COUNTY OF SAN FRANCISCO
DEPARTMENT OF CITY PLANNING

**FINAL
ENVIRONMENTAL IMPACT REPORT**

**PARK HILL
RESIDENTIAL**

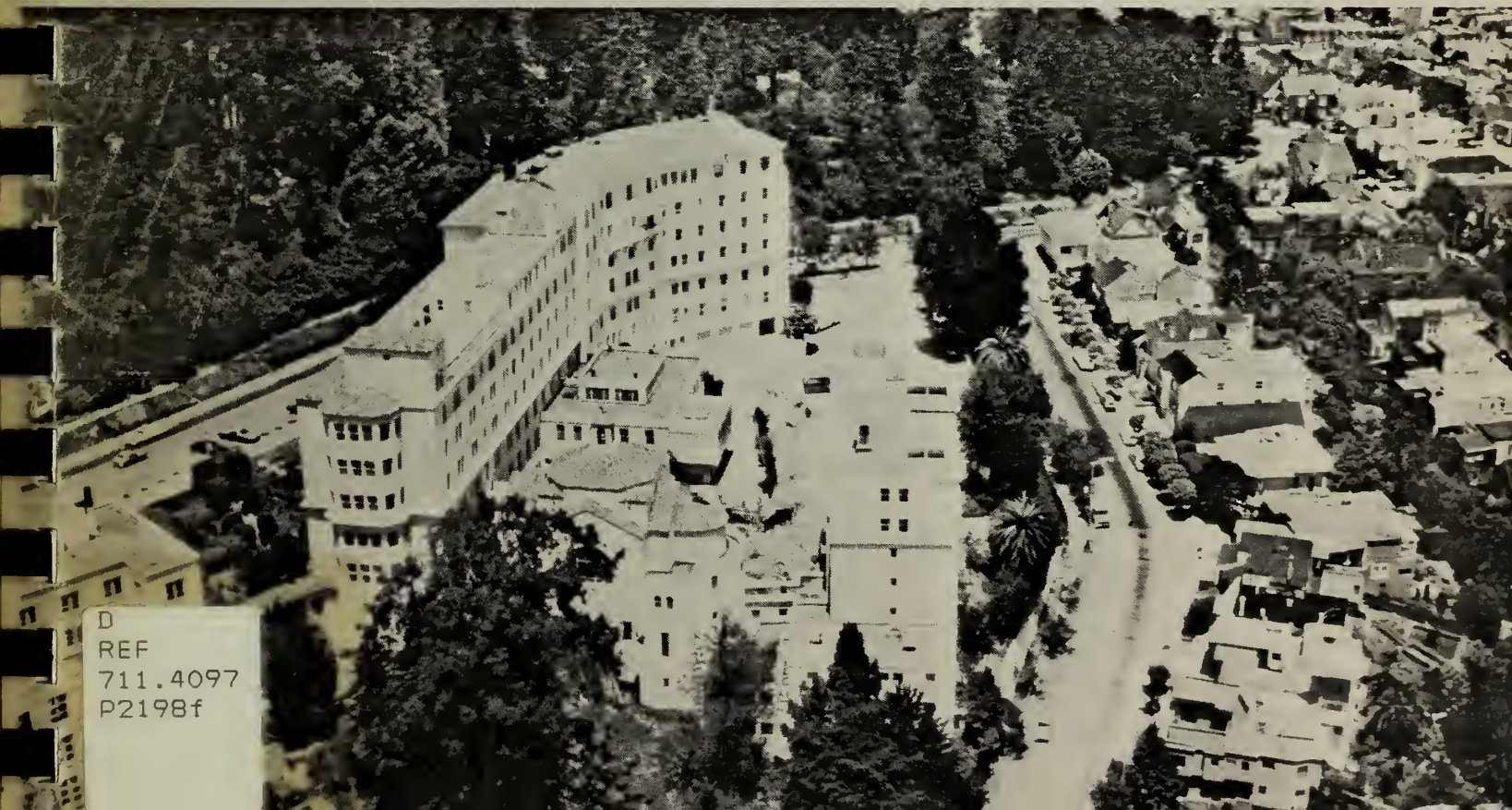
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I. SUMMARY

A. PROJECT DESCRIPTION

The project sponsor, Park Hill Associates, proposes to rehabilitate and convert the grounds and buildings of the former St. Joseph's Hospital into a residential use. St. Joseph's hospital was closed in 1979 as part of a citywide plan to consolidate hospital services. The hospital is currently leased by Children's Hospital and used by 60 employees for administrative purposes. The project site is located at 355 Buena Vista Ave. East on Lots 1 and 1A of Assessor's Block 2607. The 2.5-acre (110,000 sq. ft.) project site is situated at the southeast edge of Buena Vista Park, and has frontages on Buena Vista Ave. East and Park Hill Ave. The sponsor's objectives are to adaptively re-use the existing hospital buildings, construct new residential units with parking and landscaping, and realize a reasonable return on investment.

The project would develop a total of 200 units which would be expected to house about 300 to 350 residents. The St. Joseph's Hospital buildings, consisting of a hospital, convent and chapel, would be converted into 153 studio and one- and two-bedroom residential units, a total of about 112,000 net sq. ft. of floor area. New construction would consist of a cluster of four separate structures, ranging from two to four stories (25 ft. to 45 ft. in height). These buildings would contain 47 one- and two-bedroom townhouse units, a total of about 39,000 net sq. ft. of floor area. The new units would be constructed along Park Hill Ave., east of the existing hospital buildings.

On-site parking would be provided for 200 cars in a three-level subsurface garage, constructed underneath the townhouse buildings. Vehicular access to the subsurface garage would be from two driveways on Buena Vista Ave. East. The main ingress/egress would be via a two-way driveway located about 50 ft. from the intersection of Buena

Vista Ave. East and Park Hill Ave. A second vehicle entrance would be located immediately north of the former hospital building (see Figure 2, p. 12). From this entrance cars would pass through an interior driveway to the subsurface garage. There are about 66 on-street parking spaces in front of the hospital building on Buena Vista Ave.

- East. A total of 20,100 sq. ft. of open space and recreation area would be provided, exclusive of about 10,850 sq. ft. that would be contained in the interior driveway and plaza.

The project sponsor will request a zoning reclassification from the existing RH-2 (House, Two-Family) Planning Code Use district to a RM-2 (Mixed, Moderate Density) district and will request Conditional Use authorization for a Planned Unit Development (PUD).

B. ENVIRONMENTAL EFFECTS

VISUAL QUALITY AND SHADOWS: (see Section IV, p. 40). The new townhouse construction would obstruct views to the west of the upper slopes of Buena Vista Park, the lower portion of the hospital, and interior portions of the site from both street level and residences north of the bend in Park Hill Ave. The upper portions of the new construction, particularly of the four-story townhouse structures, would be visible as a staggered line of pitched, tile roofs from second and upper stories of residences along Park Hill Ave. Existing and proposed landscaping would partially obscure the facades of the new townhouse structures. The new townhouses structures would cast shadows on Buena Vista Ave. East and part of Buena Vista Park in the mornings (8:00 a.m.) during spring, fall and winter. The new structures would also shade portions of Park Hill Ave. and some residences located on Park Hill Ave. in the afternoons during all seasons.

TRANSPORTATION, CIRCULATION AND PARKING: (see Section IV., p. 52) during the 15-month construction period, truck traffic on local streets would increase by an estimated average of six truck stops (12 trip ends) per day. The peak period of construction truck trips would occur during the one-month excavation and debris-removal period, when a maximum of 35 truck stops (70 trip ends) per day would occur at the project site.

The proposed 200 residential units would generate about 1,400 vehicle person trip ends per day, with about 140 person trips occurring during the p.m. peak hour between 4:00 and 6:00 p.m. The units would generate an increase of about 15 vehicle trips at the Buena Vista Ave. East and Park Hill Ave. intersection during the p.m. peak hour, or about an 8% increase over existing conditions. Increases on Park Hill Ave. attributable to the project would be similar, resulting in up to 40 p.m.-peak-hour vehicle trips in comparison to the 30 trips now occurring there.

Parking demand at the Park Hill Residential project would be at a maximum on week nights when most project residents would be present and some visitor demand would occur. Weekend demand by residents of the project would not typically be as high because some of the residents would be away (but visitor demand would be greater). Surveys conducted at two residential complexes in San Francisco, (Diamond Heights Village and Telegraph Landing) and 56 complexes in the greater Bay Area and Sacramento Valley indicate that parking demand attributable to the project would range from about 200 to about 270 spaces. The proposed on-site parking of 200 spaces, in conjunction with the existing 97 curbside spaces on the Buena Vista Ave. East (66 spaces) and Park Hill Ave. (31 spaces) frontages of the site would accommodate the maximum estimated demand. There could be competition for spaces, and existing residents of Park Hill Ave. might not always be able to park directly in front of or directly across the street from their homes. Should total parking demand of the project be less than 270, the demand could be met by the 200 on-site spaces and the 65 spaces on Buena Vista Ave. East. Even if the total peak weeknight and weekend demand for parking were to be less than or equal to the 200 spaces provided on-site, some curbside parking demand would always occur. Visitors, second cars of some units' occupants, and short-term parking by residents would contribute to a demand for use of curbside spaces.

The site is served by the 37-Corbett bus line. The project would add about 60 persons on the 37 Corbett line during peak hours. This addition is equal to about half of the present unused capacity available on this line during the peak morning and afternoon commute hours.

PARK AND RECREATION FACILITIES: (see Section IV., p. 62) The estimated 300 to 350 residents of the Park Hill project would increase demand for neighborhood park space. Approximately 25% or about 70-80 of the project residents would play tennis on a regular basis. These new tennis players would create additional demand for tennis courts located in the project vicinity. This would increase the waiting time at courts for existing residents, particularly at Buena Vista Park.

ENERGY: (see Section IV., p. 63) About 5 billion Btu (about 33,000 gallons) of fuel (gasoline and diesel) would be used on the site during construction. All space and water heating would be by electricity. The project operation would require about 1.3 million kWh (about 13.3 billion Btu) of electricity annually and no (zero) natural gas. Electrical consumption would rise from about 75,000 kWh per month during the summer to about 160,000 kWh per month during the winter. The total energy budget of the project would be 15 billion Btu, a total increase of about 300% over present energy use on the site.

Project-related vehicle trips would require about 136,000 gallons of gasoline and diesel fuel annually. The total annual transportation demand would be about 19 billion Btu.

GROWTH INDUCTION: (see Section IV., p. 68) The project would increase the residential population on the site by 300 to 350 people, as the site is currently not used for residences.

The development would require a zoning reclassification to RM-2 district from the existing RH-2 district. The overall effect of the proposed zoning reclassification would be to increase the residential unit density on the project site and in the area. The area within approximately 300 ft. of the site is zoned RH-2, RH-3 and RM-1. The average unit density of the project would be about 185% greater than the existing unit density within this radius in the RH-2 district; about 122% greater than in the RH-3 district, and about 8% greater than in the RM-1 district. The project would probably not encourage construction of new residences in the surrounding areas as potential nearby development sites are limited; however, the project could encourage rezoning of nearby vacant lots to higher potential densities.

C. MITIGATION MEASURES (see Section V., p. 70)

Various measures have been identified that would reduce or eliminate potential environmental impacts of the proposed project. The City Planning Commission could include some or all of these measures as conditions of project approval. Mitigation measures which are specific to the project and not required by statutes or laws include:

- Additional landscaping would be planted along Park Hill Ave. to further buffer views of the new development from the surrounding neighborhood and to moderate the institutional look of the existing grounds of the former hospital complex.
- Construction equipment and materials would be stored on site rather than on the street, thereby eliminating potential line-of-sight hazards for drivers and reducing interference with neighborhood parking.
- The contractor would be required to wet down haul truck loads leaving the site during the one month of excavation and grading activities to mitigate dust generation and potential spills along haul routes.
- On-site open space (consisting of garden landscaping, footpaths and sitting areas), a private indoor health club and a sundeck, would be provided to help meet demand for recreation facilities on site.
- The sponsor would install multiple trash bins in place of single units to encourage source separation of recyclable materials.

D. ALTERNATIVES TO THE PROPOSED PROJECT (see Section IX., p. 77)

ALTERNATIVE A - Demolition of Existing Buildings and Subdivision (no special approval required). This alternative would demolish the St. Joseph's Hospital complex and subdivide the entire 2.5-acre site into 44 lots of 2,500 sq. ft. each. Construction of a two-family dwelling structure on each lot would provide a total of 88 units, 112 units fewer than would be developed by the project. This alternative would comply with the present RH-2 Planning Code Use (Zoning) district. As required by Section 151 of the City Planning Code, a minimum of one parking space would be provided for each unit, or two spaces per structure.

Impacts associated with this alternative include loss of the St. Joseph's Hospital complex outline from the City skyline and reduction of existing shadows on Buena Vista Park and Park Hill Ave. residences. This alternative would generate about 55% fewer vehicle trips than those generated by the project. Total parking demand for Alternative A would be about 90 to 120 spaces. These spaces could be provided by the 88 on-site parking spaces and 66 curbside spaces on Buena Vista Ave. East along the site frontage. Demand for park and open space would be about 55% less than for the proposed project. About 40 to 45 fewer tennis players would be generated by Alternative A than by the project. This alternative would require about 55% less energy annually than would the project. The unit density of Alternative A would be 35 units per acre, as compared to the project density of 80 units per acre. This alternative would forego the opportunity to develop 112 units of housing in the City when compared to the project.

ALTERNATIVE B - Use of Only Existing Buildings (two parking spaces per unit). In this alternative the existing hospital and convent building would be refurbished and contain a total of 109 units; no new construction of residential units would occur along Park Hill Ave. Alternative B would provide two on-site parking spaces (218 spaces) for each residential unit. The 220 spaces would be 100% more than the minimum number of spaces per unit required by Section 151 of the City Planning Code. The 109 additional spaces would require a Conditional Use authorization (Section 157 of the City Planning Code). The existing chapel building would be retained (not converted to residences) and could be used as a private community room by residents of the Park Hill project.

The 218 parking spaces would be developed along Park Hill Ave., in the area proposed in the project for new construction. The parking would be constructed on three levels, one surface level and two subsurface levels.

Alternative B would require a Conditional Use authorization for a Planned Unit Development (PUD). This would allow development of 109 units, 21 to 36 units more than would be allowed in an RH-2 district without a PUD (73-88 units).

Visual impacts of this alternative would be similar to those of the proposed project in that the hospital, convent and chapel would be retained and refurbished, and different in that no new residential construction would be located on Park Hill Ave. Vehicle trip and transit impacts associated with Alternative B would be 45% less than those for the

proposed project. Total parking demand would be for about 110 to 150 spaces, as compared to total project demand of 200 to 270 spaces. Alternative B would result in minimal use of curbside parking by residents and their guests. The demand for park and recreation facilities would be 45% less than for the proposed project as there would be fewer residents and tennis players generated by Alternative B than by the project. Energy requirements would be about 45% less than project energy requirements. In Alternative B, the unit density would be about 45 units per acre, 35 units fewer per acre than would be developed in the proposed project.

● ALTERNATIVE C: Use of Existing Building Only (One Parking Space per Unit)

This alternative would provide a total of 137 units. The existing hospital and convent building would be refurbished, no new construction would occur. Alternative C would require a zoning reclassification to RH-3, as well as a Conditional Use authorization for a Planned Use Development (PUD). One self parking space per unit would be provided. This alternative would not change the existing visual appearance of the site, traffic impacts would be about 30% less than those of the proposed project.

Alternative C would increase the population of the area by 205 to 240 persons. Demand for park and recreation facilities in the project vicinity would be 30% less.

A variant to Alternative C would construct 168 units, 32 of which would be for elderly/handicapped residents.

ALTERNATIVE D - Use of Existing Buildings and Reduced-Scale New Construction. This alternative would provide a total of 182 units. As with the project, a total of 153 units would be developed in the hospital, convent, and chapel buildings. However, new construction along Park Hill Ave. would be about 30 units, 17 fewer than proposed by the project. Alternative C would require a zoning reclassification from an RH-2 to an RM-1 district and a Conditional Use authorization for a Planned Unit Development (PUD) to allow an additional density of about 45 units. Alternative C would provide one parking space per unit, a total of 182 spaces. Parking would be located under the new construction in three subsurface levels. Site ingress and egress would be similar to that of the proposed project.

Visual impacts of this alternative would be similar to those of the proposed project; however, there would be less new construction along Park Hill Ave. Traffic and parking demand would be about 10% less for this alternative than for the project. Demand for park and open space would be about 10% less than for the proposed project. This alternative would generate about 65 to 75 new tennis players; for comparison the project would generate about 70 to 80 new players. Energy requirements would be about 10% less than those for the project. Alternative C would develop about 75 units per acre, as compared to the project development of 80 units per acre.

ALTERNATIVE E - No-Project Alternative. This alternative would retain existing conditions at the project site. It would also preserve options for future development of the site, including reinstatement of a hospital use. The convent and chapel could be used for ancillary hospital buildings.

If existing conditions were to remain, the visual appearance of the site would not change. The 60 employees of Children's Hospital would continue to work on the site and create a traffic and parking demand. The no-project alternative would not raise the demand for park and recreation facilities in the area, and the energy requirements would be unchanged from those described in the Setting section, pp. 35 - 39.

If the hospital were returned to full medical operation, the traffic generation would be about 200% greater than that of the proposed project. This alternative would not change the visual appearance of the existing buildings, nor would it involve any additional construction. Returning the site to hospital use would not create any additional demand for park or recreation facilities in the project vicinity. Resinstitution of a hospital use would require about 300% more at-source energy than would the proposed project.

II. PROJECT DESCRIPTION

A. PROJECT SPONSOR'S OBJECTIVES

The project sponsor is Park Hill Associates, a joint-venture partnership of Prometheus Development Company and the Aspen Group West, Inc. Park Hill Associates propose to rehabilitate and convert the grounds and buildings of the former St. Joseph's Hospital into a residential use. The sponsor's objectives are to adaptively re-use the existing hospital buildings, construct new residential units with parking and landscaping, and realize a reasonable return on investment. The new construction is intended to complement the existing hospital buildings architecturally and to respect the scale of nearby residences.

- Project development is proposed at the present time instead of preserving future site options to stop deterioration of the existing hospital complex, and to respond to the demand in the City for additional housing. The project architect is Kaplan/McLaughlin/Diaz of San Francisco.

B. PROJECT LOCATION

The project site is located at 355 Buena Vista Ave. East on Lots 1 and 1A of Assessor's Block 2607 (see Figure 1, p. 10). The 2.5-acre (110,000 sq. ft.) project site is situated across from the southeast edge of Buena Vista Park, and has frontages on Buena Vista Ave. East and Park Hill Ave. Existing site buildings are located along Buena Vista Ave. East and Park Hill Ave. and within the interior of the site; new construction would be located parallel to, but set back from, Park Hill Ave. Park Hill Ave. ascends from an elevation of 340 ft. (San Francisco Datum) at its intersection with Roosevelt Way (southeast corner of the site) to 390 ft. at its intersection with Buena Vista Ave. East (northeast corner of the site). Buena Vista Ave. East ascends from 390 ft. at its intersection with Park Hill Ave. to 430 ft. at the northwest corner of the site.

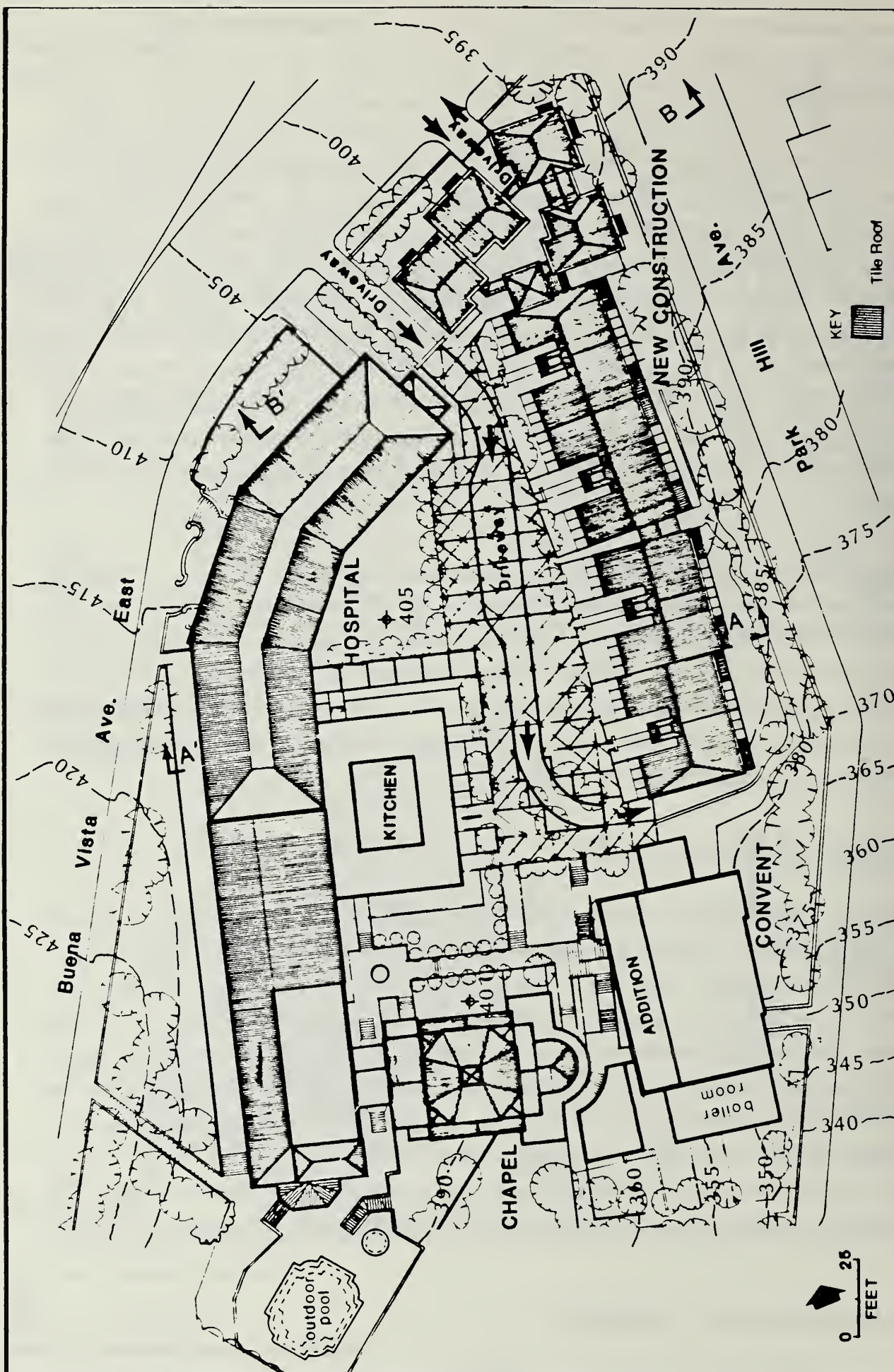
C. SITE HISTORY

St. Joseph's Hospital was founded in 1889. The existing hospital complex was built between 1920 and 1928; it consists of a hospital, a convent and a chapel. In 1979 the hospital was closed, in conformity with a citywide plan to consolidate hospital services. The project would retain all existing buildings on site. New construction would occur on what is now a parking lot, the site of a hospital building that was demolished in 1926. The project sponsor has applied for the St. Joseph's Hospital complex buildings to be certified as historic structures and placed on the National Register of Historic Places. Such designation could, under certain conditions, entitle the sponsor to tax credits under the 1981 Economic Recovery Tax Act. The State Historical Resources Commission has approved the nomination and forwarded it to Washington D.C. for consideration by federal agencies.

Southwest of the hospital building is the four-story St. Joseph's College of Nursing building (Lot 99 and 23 of Assessor's Block 2607). On November 4, 1982, the City Planning Commission approved a project that would remodel the College of Nursing building into a 60-unit bed and care facility (catering to people who need special short-term care after having been released from hospitals) with 11,800 gross (9,800 net) sq. ft. of ancillary medical office space. The College of Nursing is not included in the project site or the project sponsor's interests.

D. PROJECT CHARACTERISTICS

The project would develop a total of 200 units (see Figures 2, 3 and 3a, pp. 12, 13 and 13a). The St. Joseph's Hospital buildings would be converted into 153 studio and one- and two-bedroom residential units, a total of about 112,000 net sq. ft. of floor area (see Appendix B, p. 248 for a detailed description of the proposed bedroom mix of the project). The six-story hospital building and kitchen unit would contain 112 units, the six-story convent building 34 units, and the chapel seven units (see Figures 4, 5, 6 and 6a, pp. 14-16a). New construction would be added to the west side of the convent building for seismic reinforcement (see Figure 5a, p. 15a). The exteriors of the three buildings would remain essentially the same, although some of the windows would be enlarged and some balconies would be added, if feasible, to improve the amenities for residential uses.

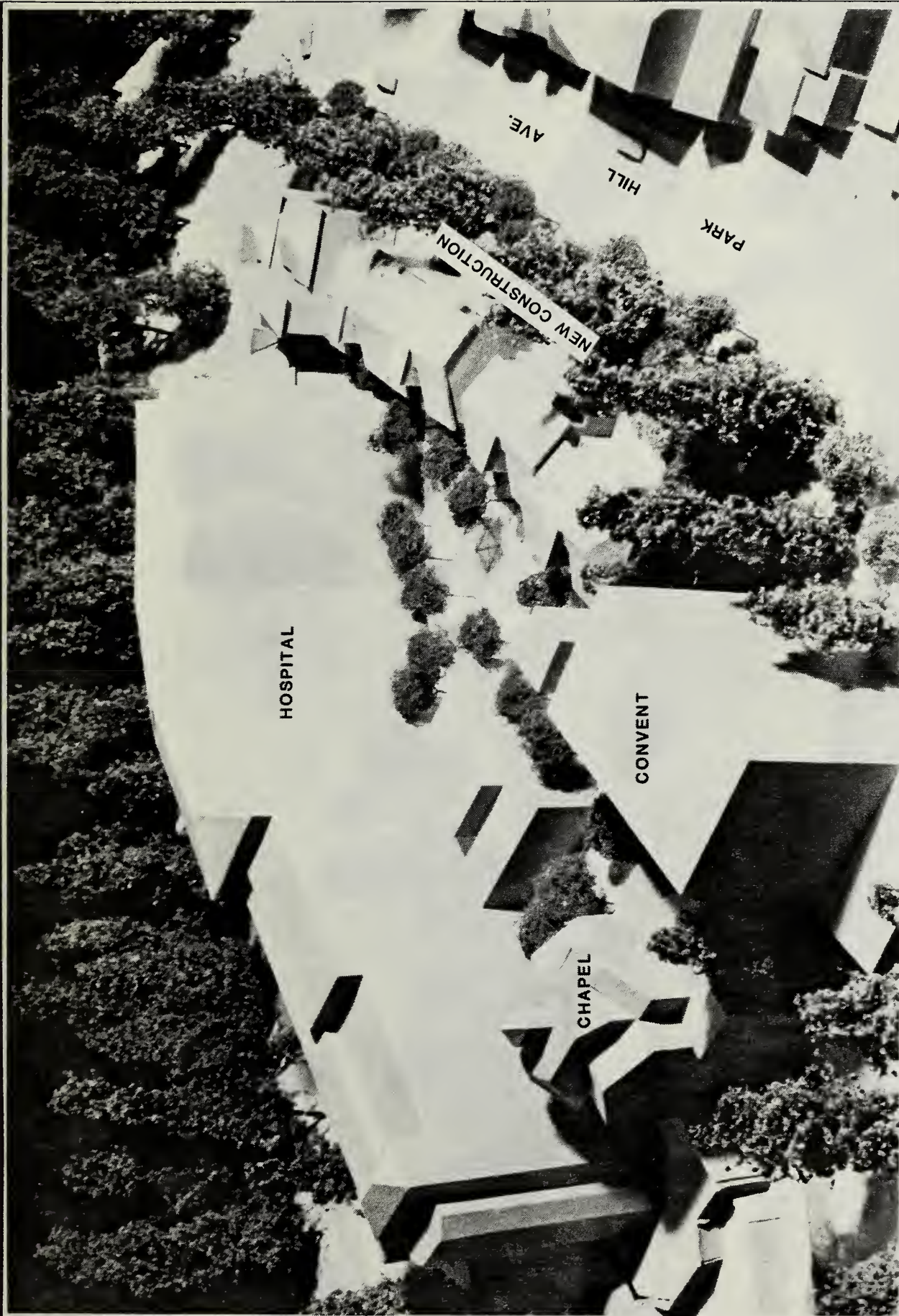


A A' Approximate Location of Cross Section (Refer to Figure 8)

B B' Approximate Location of Cross Section (Refer to Figure 8a)

SOURCE: Kaplan/McLaughlin/Diaz

● FIGURE 2: Site Plan



NOTE The placement of trees on the model is conceptual and does not represent the actual heights or dimensions of proposed or existing trees on the project site

FIGURE 3: Photograph of Project Model
Looking Northwest

SOURCE: Kaplan/McLaughlin/Diaz



FIGURE 3a: Photograph of Project Model
Looking Southwest

The placement of trees on the model is conceptual and does not represent the actual heights or dimensions of proposed or existing trees on the project site

SOURCE : Kaplan/McLaughlin/Diaz

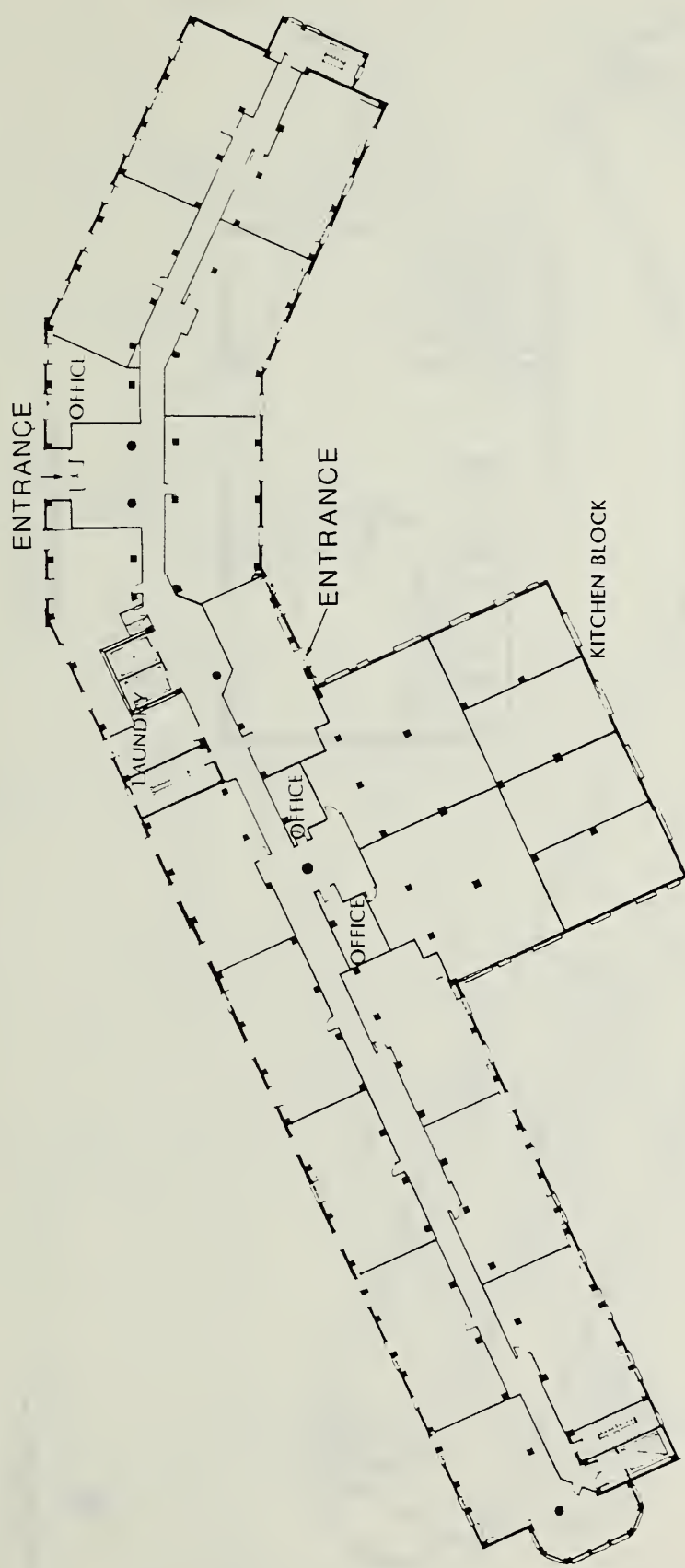
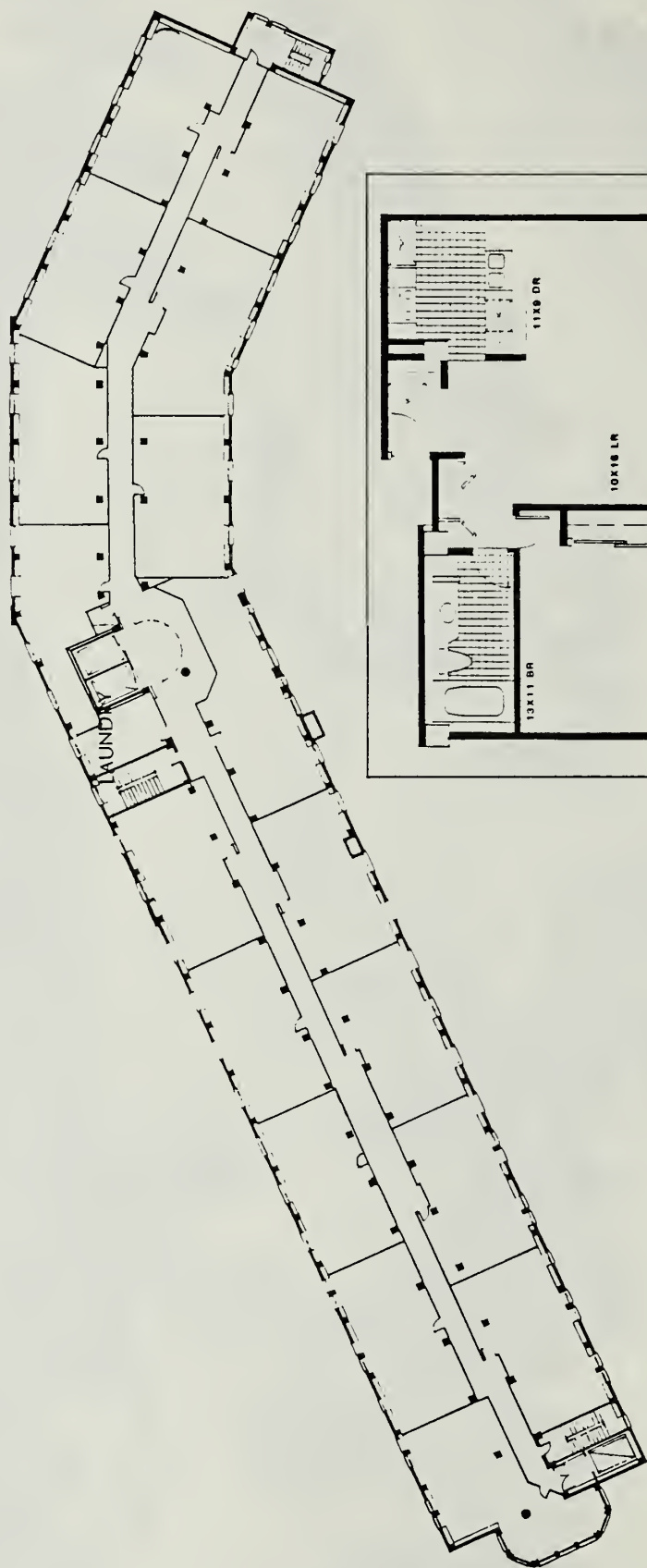


FIGURE 4: Hospital Buildings Floor Plan (Entry Level)

SOURCE: Kaplan / McLaughlin/Diaz

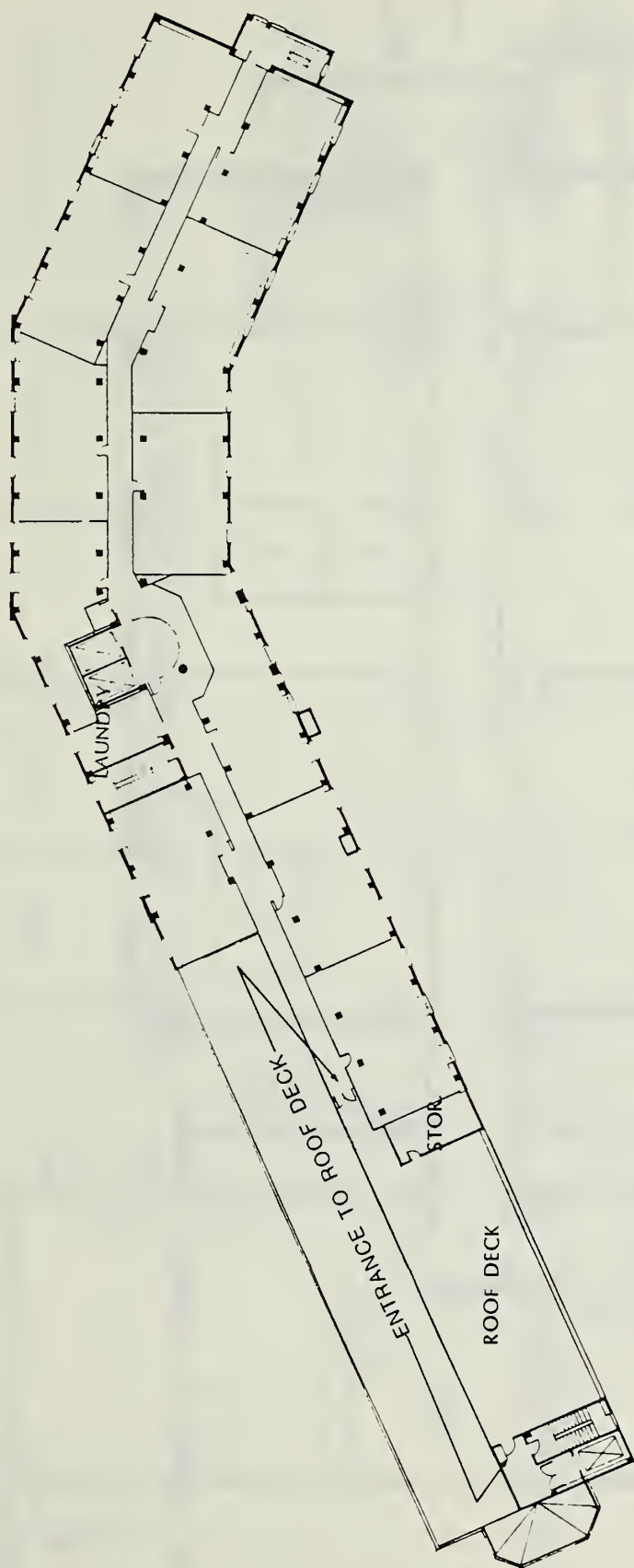


UNIT A
1 BEDROOM FLAT
1 BATH
690 S.F.

Typical Unit Plan
(not to scale)

● FIGURE 4a: Hospital Building Typical Floor (Floors 2-5)

SOURCE: Kaplan/McLaughlin/Diaz



● FIGURE 4b: Hospital Building Floor Plan (Roof Level 6)

SOURCE: Kaplan/McLaughlin/Diaz

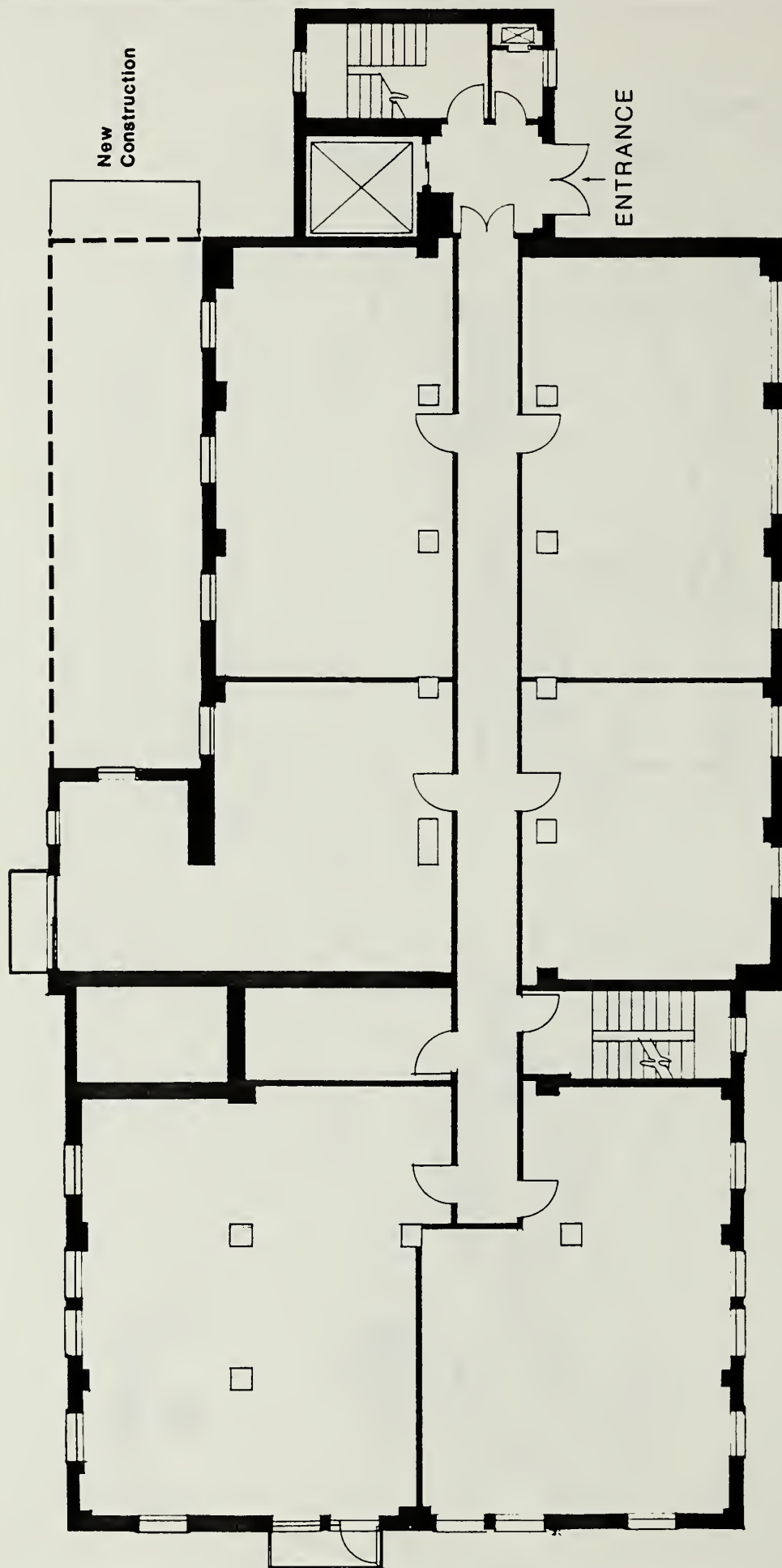
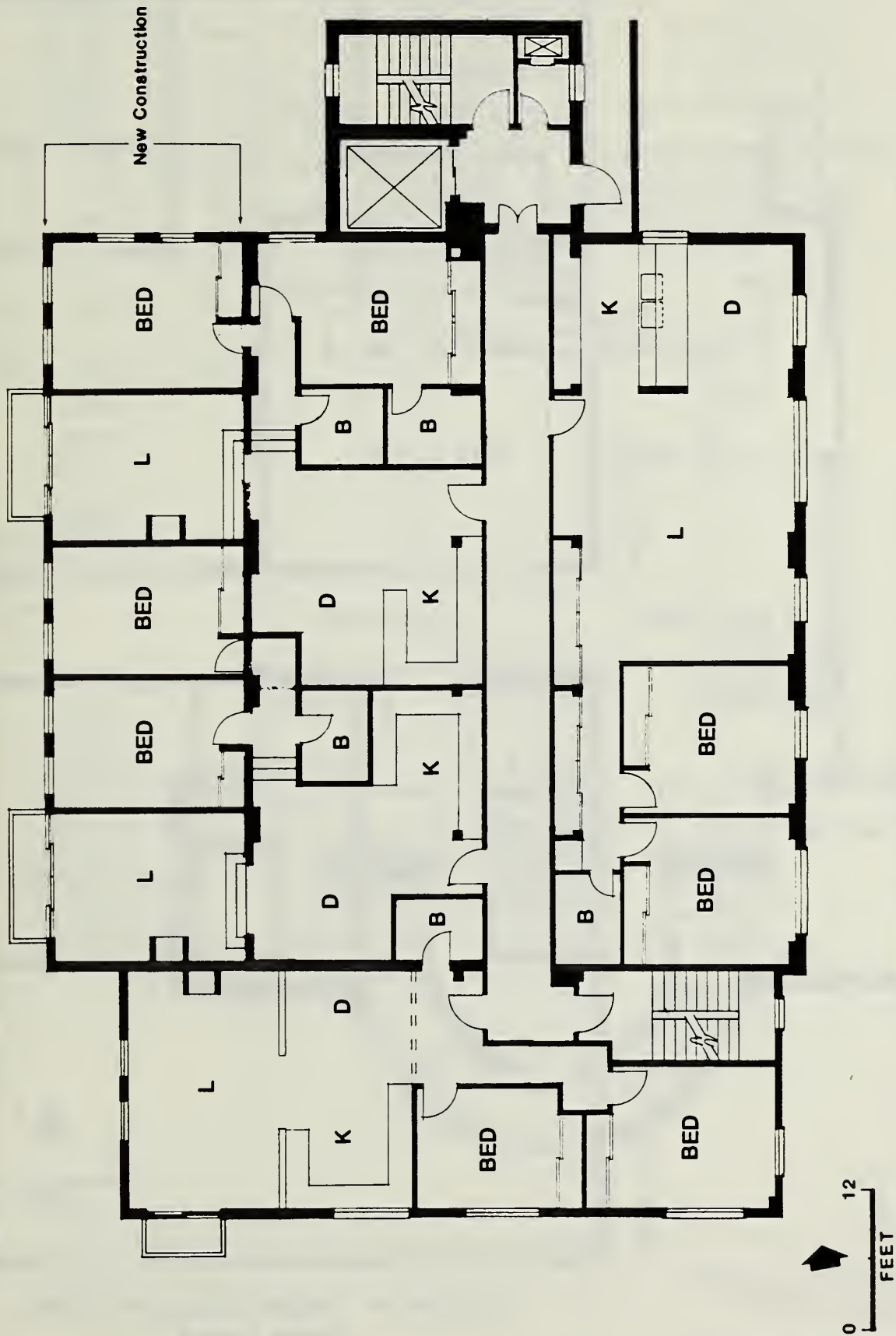


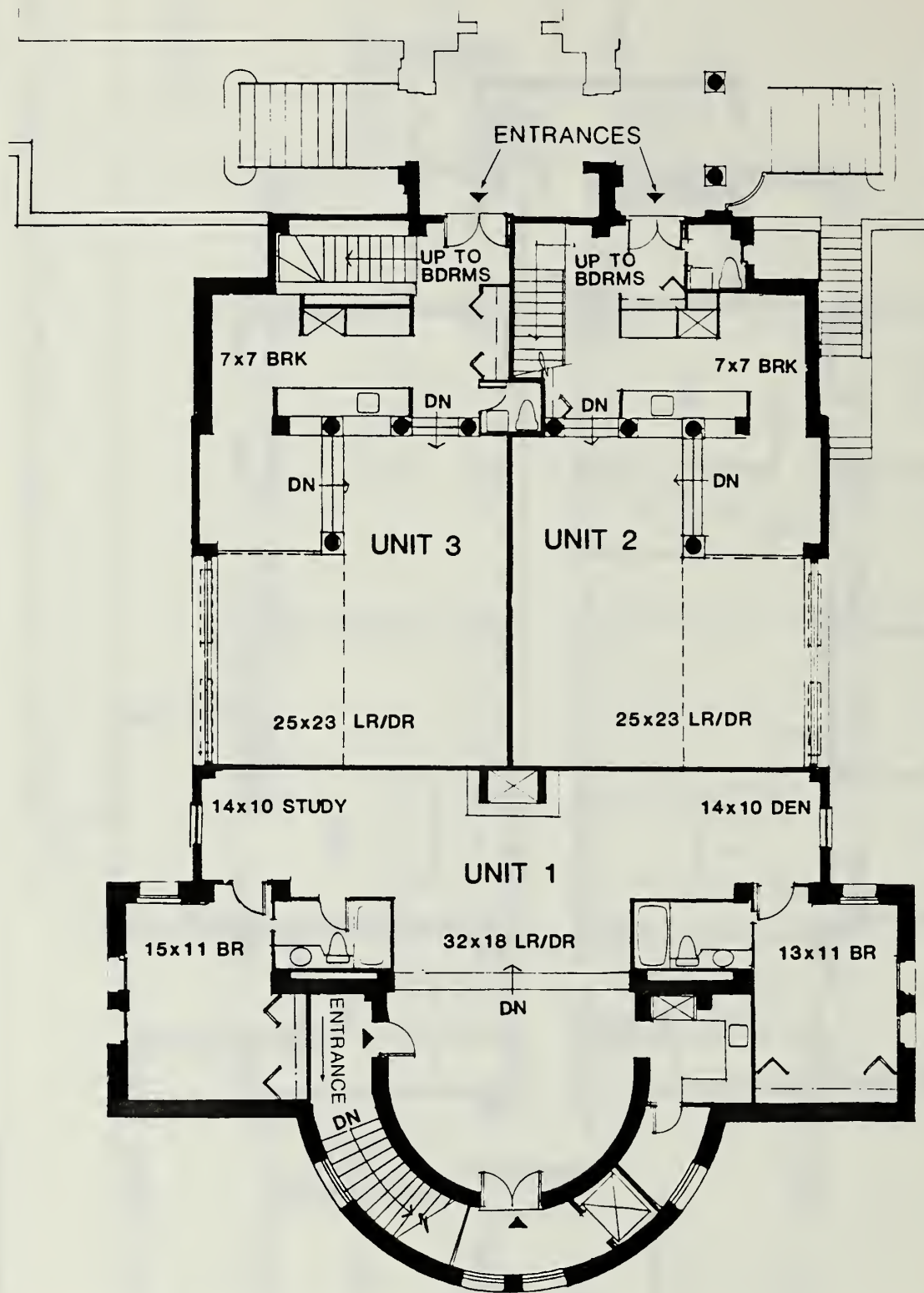
FIGURE 5: Convent Building Floor Plan (Ground Floor)

SOURCE: Kaplan/McLaughlin/Diaz



● FIGURE 5a: Convent Building Floor Plan (Typical Upper Floor)

SOURCE: Kaplan/McLaughlin/Diaz



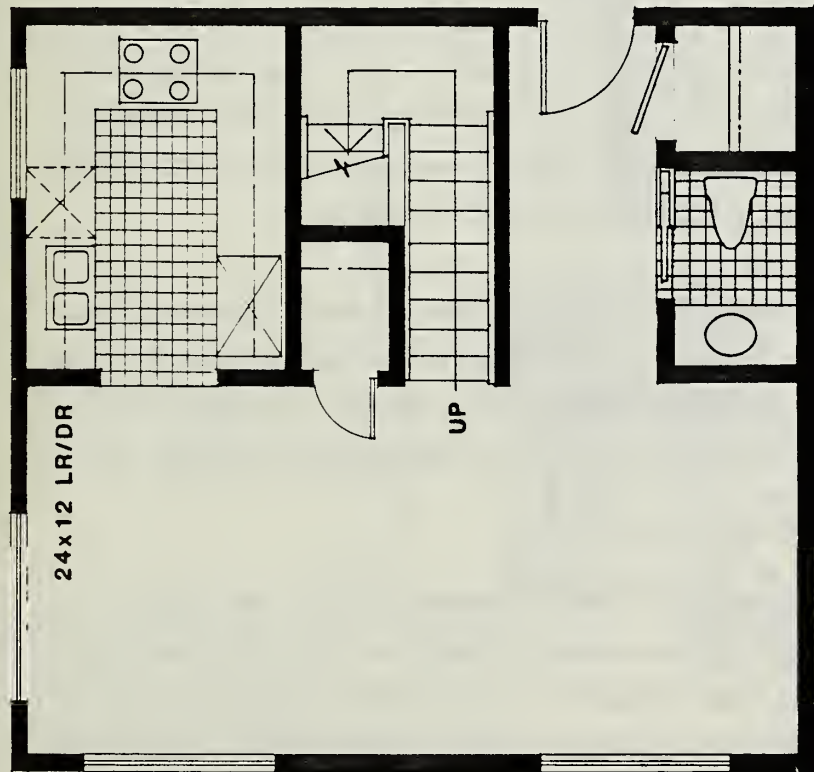
UNIT 1	1450 S.F.
2 BDRM	
2 BATH	
UNIT 2	1580 S.F.
2 LEVELS	
2 BDRM	
2 1/2 BATH	
UNIT 3	1580 S.F.
2 LEVELS	
2 BDRM	
2 1/2 BATH	
TOTAL	
FLOOR 1	3270 S.F.
LOFT	1330 S.F.
	4600 S.F.



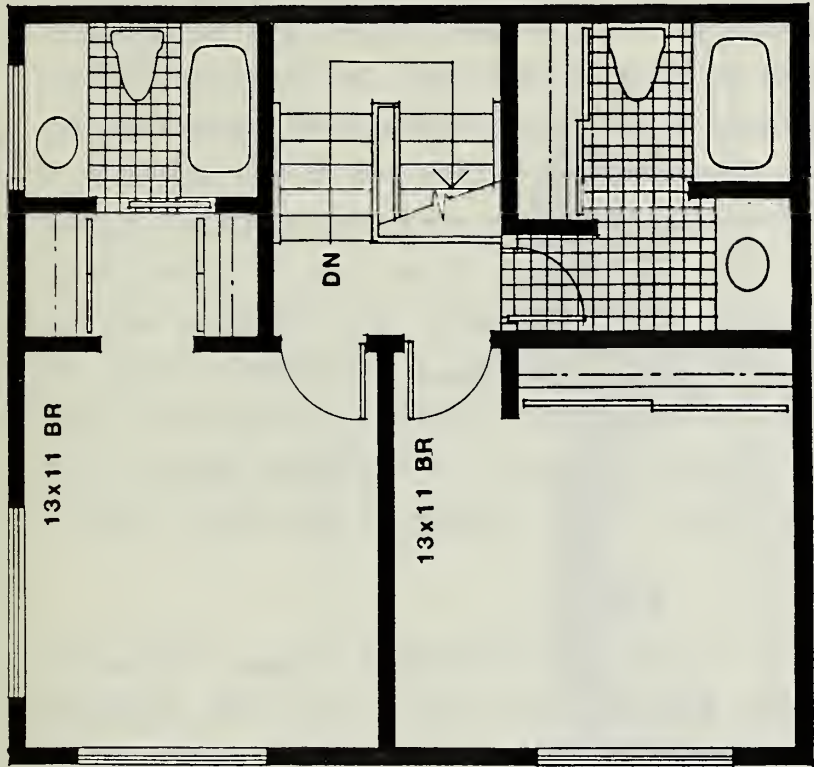
NOTE The entrance to Unit 1 is one level below the unit and is served by the stairway and elevator shown on the plan.

● FIGURE 6: Chapel Building Floor Plan (Entry Level)

SOURCE: Kaplan/McLaughlin/Diaz

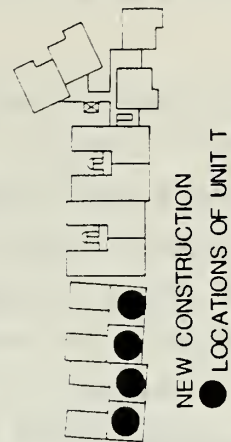


LOWER LEVEL



UPPER LEVEL

UNIT T
2 LEVEL
2 BEDROOM
2 1/2 BATH
1100 S.F.



● FIGURE 6a: New Construction (Typical Unit Floor Plan)

II. Project Description

New construction would consist of a cluster of four separate structures, ranging from two to four stories in height. These buildings would contain 47 one- and two-bedroom townhouse units, a total of about 39,000 net sq. ft. of floor area. The new units would be constructed along Park Hill Ave., northeast of the hospital buildings (see Figure 7 and 7a, p. 18 and 18a). These buildings would increase in height from two to four stories in a northern direction. The two-story, 26-ft.-high townhouse structures would be situated along the lower portion of the Park Hill Ave. frontage of the site. The four-story, 44-ft.-high structure would be located at the upper end of Park Hill Ave., near its intersection with Buena Vista Ave. East (see Figure 8 and 8a, p. 19 and 19a). The design of the new construction is intended by the project architect to complement the architectural style of the existing hospital buildings. The townhouse design would incorporate scale, texture, color and windows similar to those of the hospital complex buildings.

On-site parking would be provided in a three-level subsurface garage, constructed underneath the townhouse buildings (see Figures 9, 10, and 11, pp. 20- 22). Vehicular access to the subsurface garage would be from two driveways on Buena Vista Ave. East. The main ingress/egress would be via a two-way driveway located about 50 ft. from the intersection of Buena Vista Ave. East and Park Hill Ave. A second vehicle entrance would be located immediately north of the former hospital building (see Figure 2, p. 12). From this entrance vehicles would pass through an interior driveway to a ramp leading to the subsurface garage. The interior driveway would be decoratively paved and landscaped, and would include a passenger waiting area. As only one-way access would be provided by this driveway, it is intended for short-term passenger dropoff or pickup.

The subsurface garage would contain 200 self-park spaces, one per unit. There are about 66 on-street parking spaces located on Buena Vista Ave. East immediately in front of the hospital building. These spaces are currently used during the day by administrative employees of Children's Hospital who work (temporarily) in the hospital building, and at night by nearby residents.

- All loading and service access would be from Buena Vista Ave. East (see Figure 11a, p. 22a). Garbage collection would occur at the existing driveway at the northeast corner of the existing hospital building. The trash collection area would be located under the canopy which encloses the former emergency vehicle entrance to the hospital. Deliveries and moving of household goods would occur at the main hospital entrance on Buena Vista Ave. East or within the interior driveway.

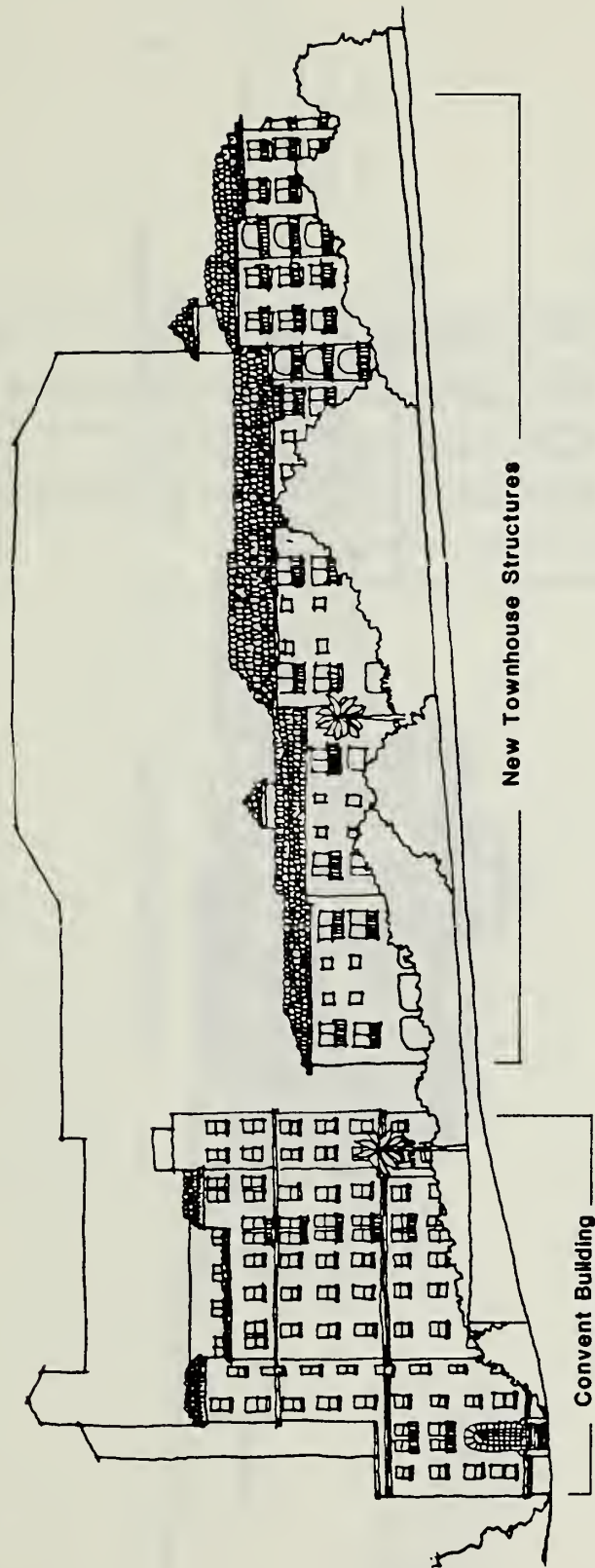
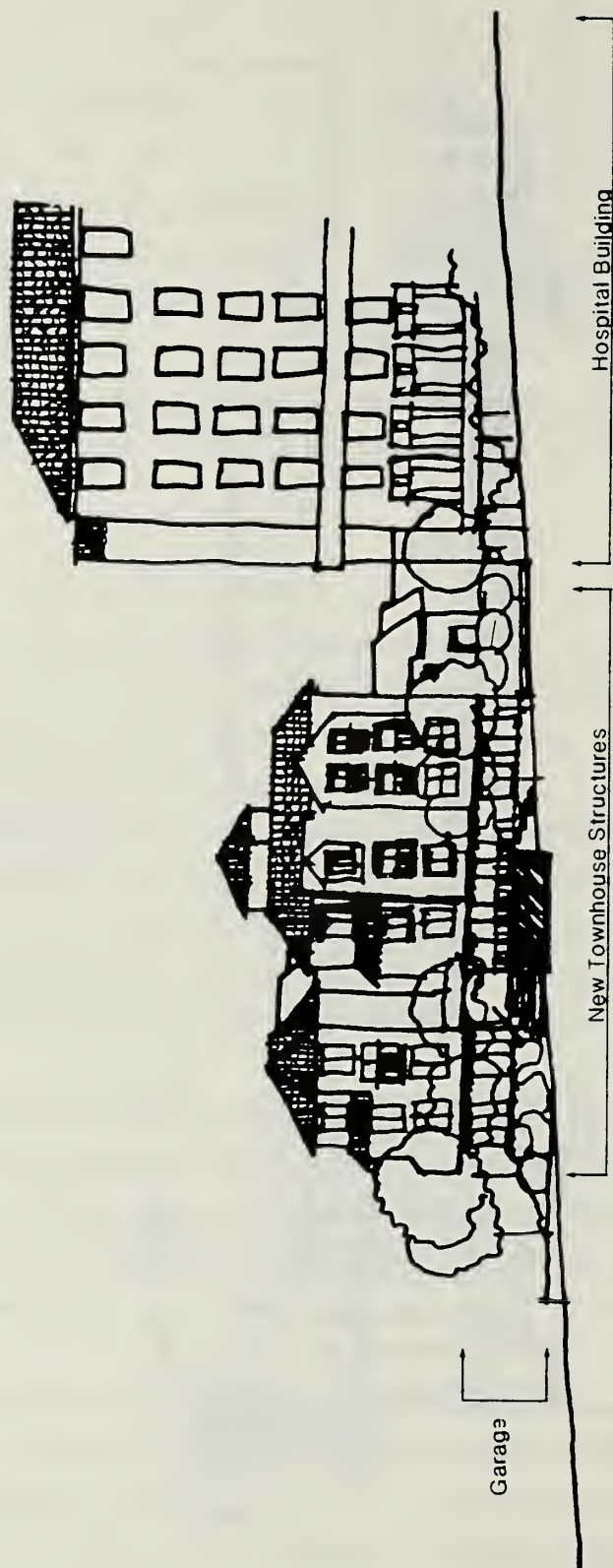


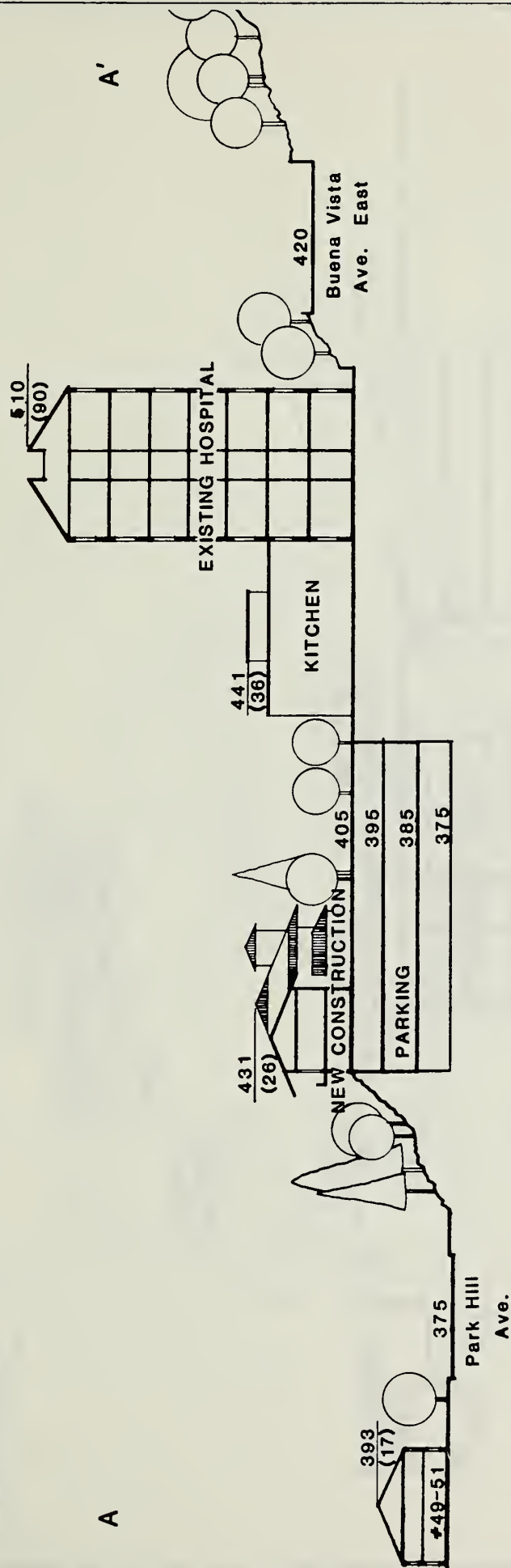
FIGURE 7: East Elevation (Facing Park Hill Ave.)

SOURCE: Kaplan/McLaughlin/Diaz



● FIGURE 7a: West Elevation (Facing Buena Vista Ave. East)

SOURCE: Kaplan/McLaughlin/Diaz



KEY*

431 SF Datum Elevation

(26) Building Height

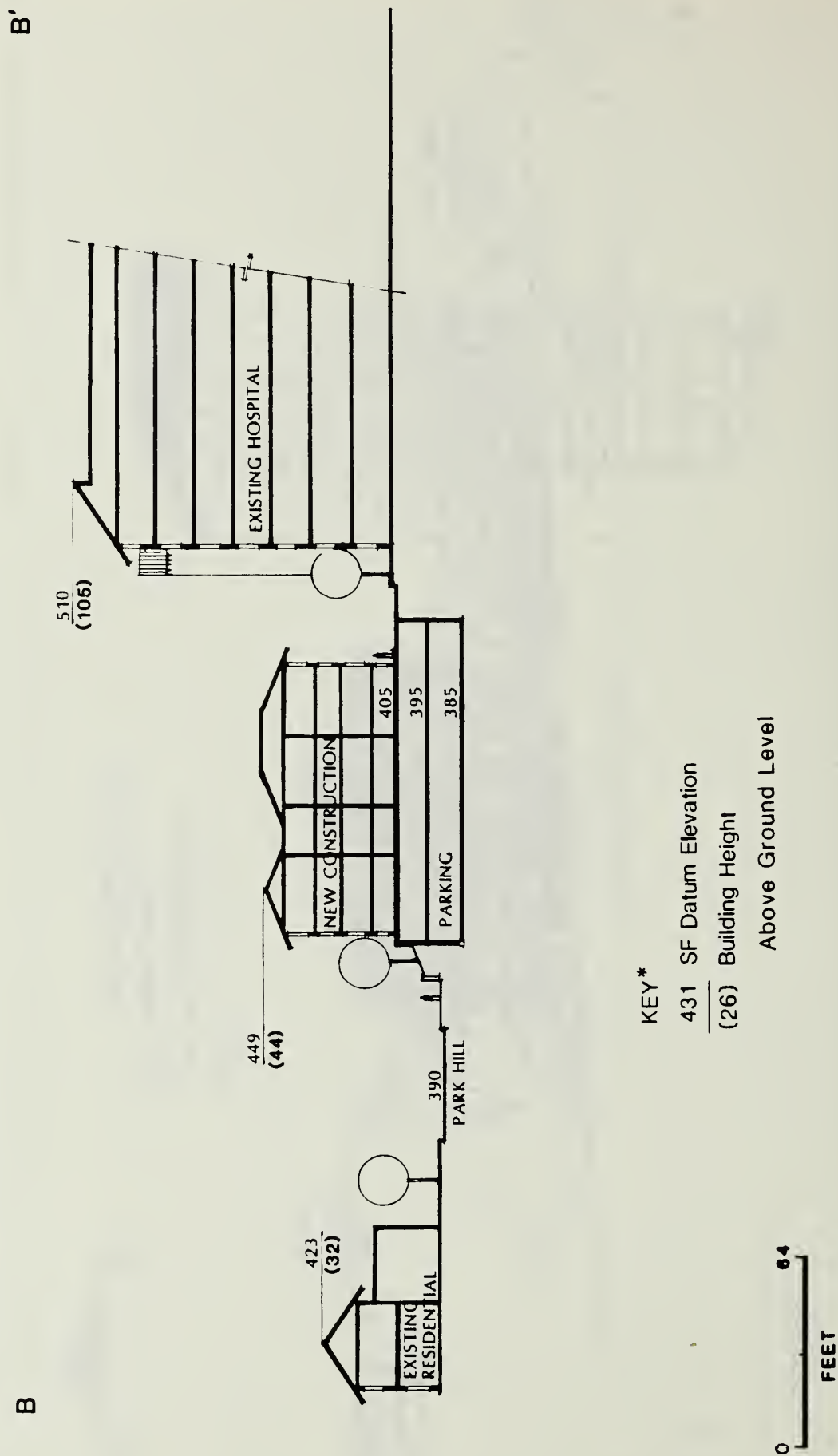
Above Ground Level



*(Refer to Cross Section Location on Figure 2)

SOURCE: Kaplan/McLaughlin/Diaz

● FIGURE 8: East-West Site Section



* (Refer to Cross Section Location, Figure 2)

● **FIGURE 8a: East-Southeast Site Section**

SOURCE: Kaplan/ McLaughlin/ Diaz

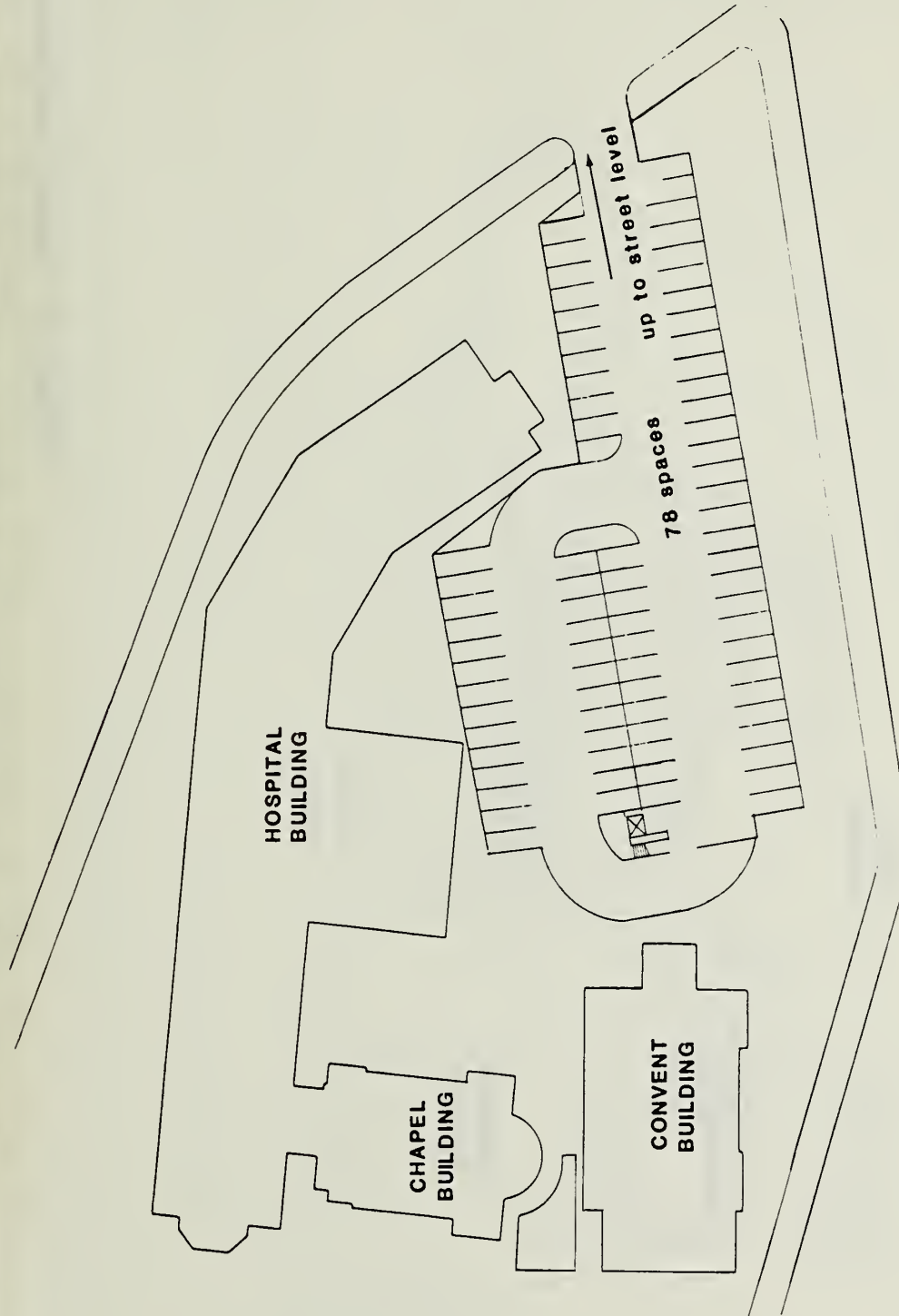


FIGURE 9: Parking Level Elevation 395

SOURCE: Kaplan/McLaughlin/Diaz

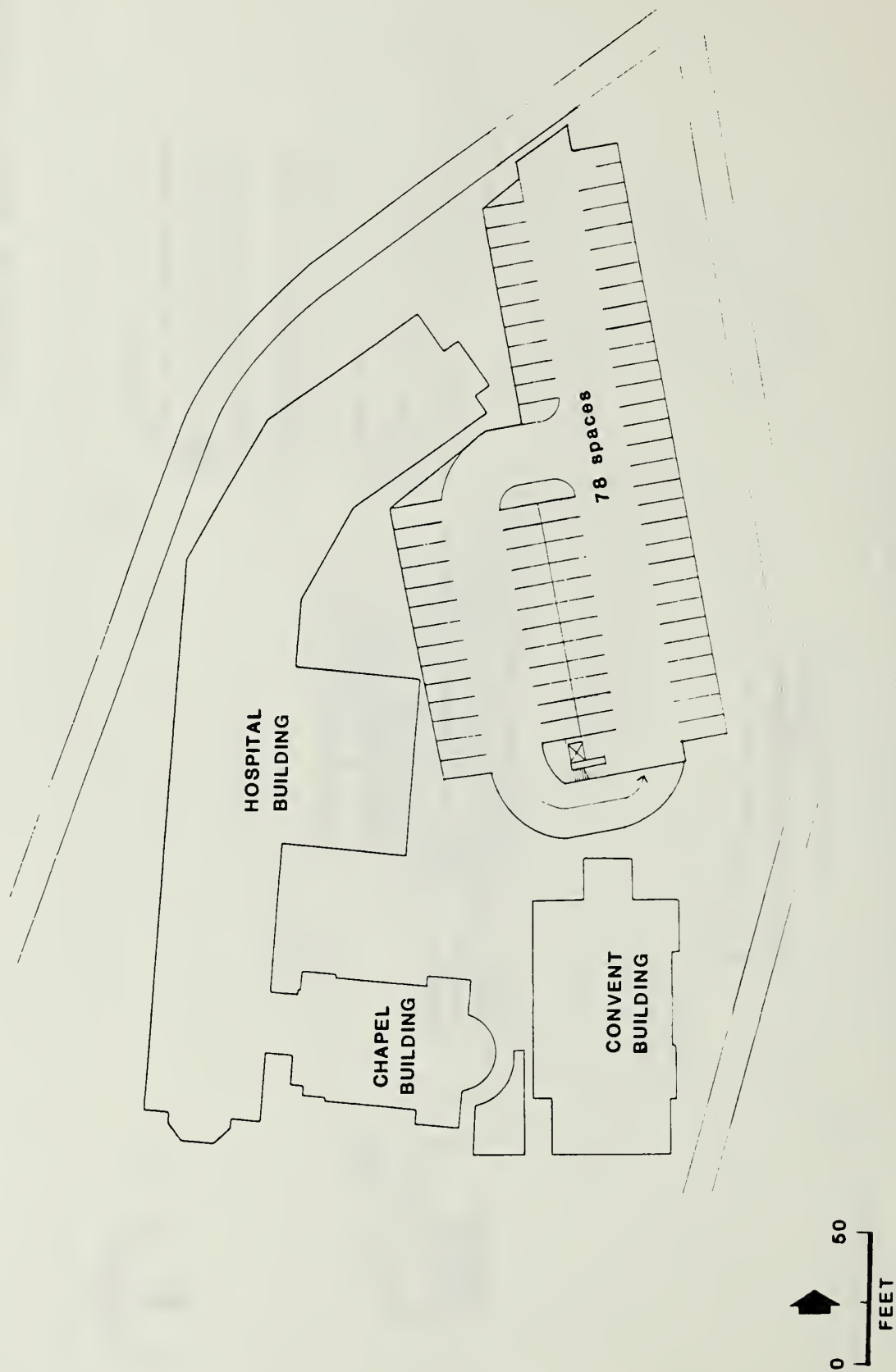


FIGURE 10: Parking Level Elevation 385

SOURCE: Kaplan/McLaughlin/Diaz

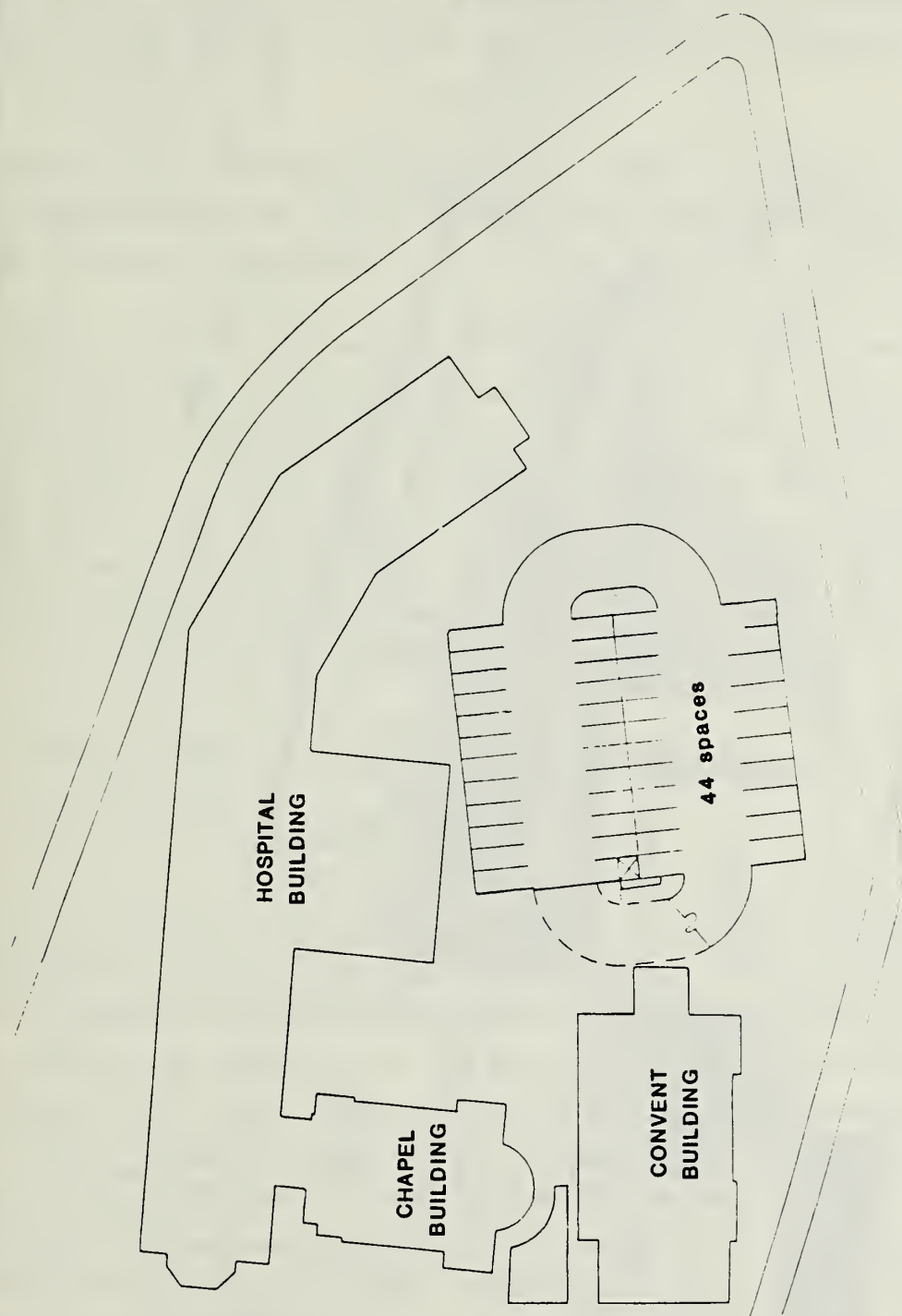
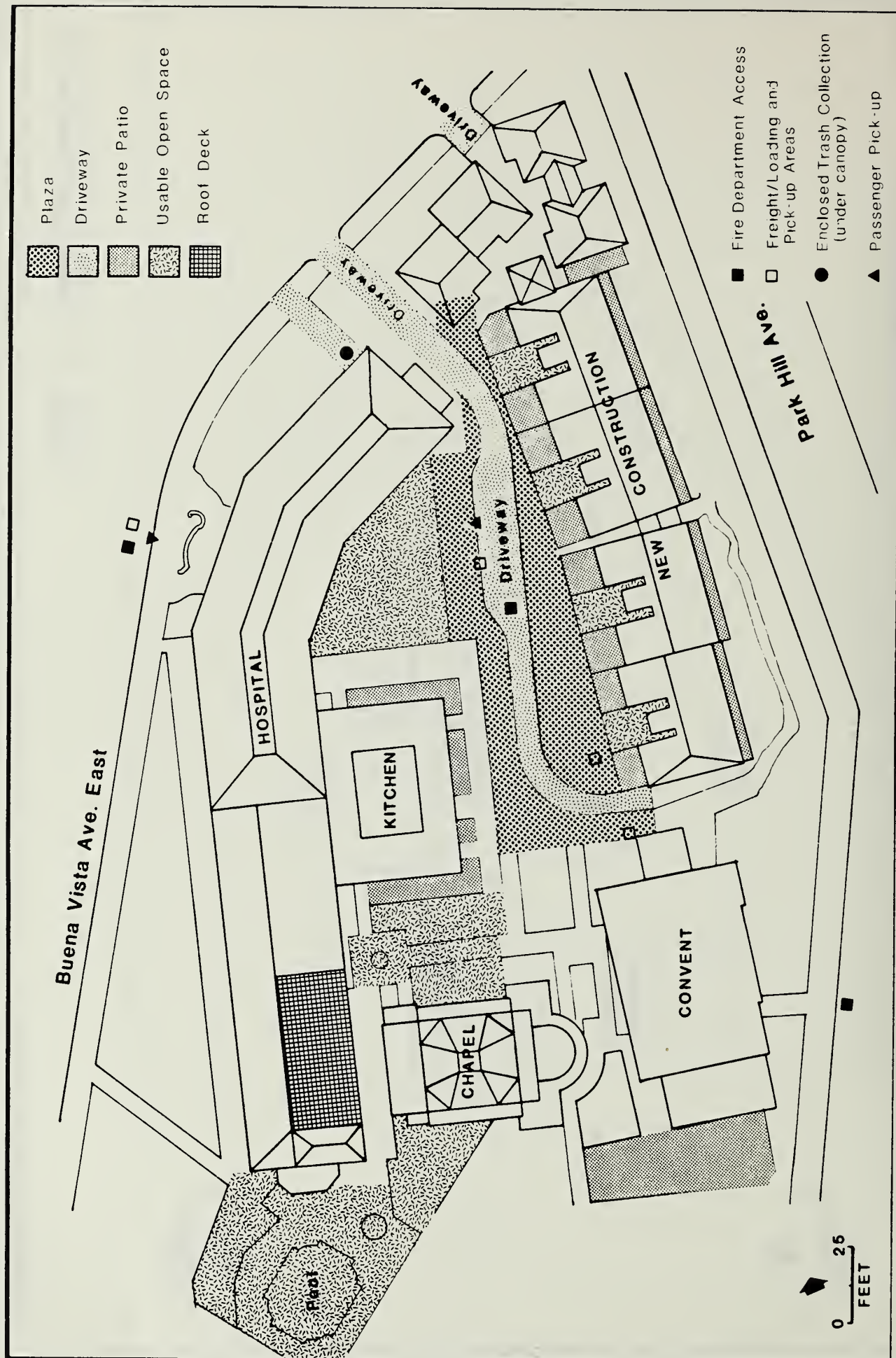


FIGURE 11: Parking Level Elevation 375

SOURCE: Kaplan/McLaughlin/Diaz



● FIGURE 11a: Open Space and Freight and Service Access

II. Project Description

- Landscaped terraces would step down from the hospital building to the landscaped frontage along Park Hill Ave. The project perimeter would be landscaped extensively, especially along Park Hill Ave., to provide a visual buffer between Park Hill Ave. and the new construction.

Proposed on-site recreational facilities include exercise rooms and a sun deck on top of the hospital building. An outdoor swimming pool located south of the hospital is also being considered for the project.

- The project would contain about 31,000 sq. ft of open space, plaza and driveway areas. This includes 8,160 sq. ft. of landscaping; 4,075 sq. ft. of recreational paved area (including the swimming pool); 6,225 sq. ft. of private patios; 4,810 sq. ft. of driveway area; 6,040 sq. ft. of plaza area; and the 1,665-sq.-ft. roof deck on top of the hospital building (see Figure 11a, p. 22a). The driveway and plaza area (10,850 sq. ft. would be used for emergency vehicle access, Fire Department maneuvering space and delivery areas). The open space described above does not include about 34,600 sq. ft. of walkways, stairs, and unusable (due to inaccessibility) landscaped areas.

E. PROJECT SCHEDULE, OCCUPANCY, AND COST

SCHEDULE AND OCCUPANCY

The total estimated construction period would be 15 months./1/ A detailed project design is scheduled by the sponsor for completion in late 1983. Structural rehabilitation of the convent, chapel and hospital buildings would require about six months. Minor demolition, site clearance and excavation for the new townhouse buildings and subsurface garage would require about three months, and exterior finishing of the townhouse buildings, about two months. Interior finishing of the existing buildings and new construction would require about nine months. Some of these time durations would overlap. Project occupancy would begin in early 1985. At full buildout the project would house a total of between 300 and 350 persons (see Appendix B, p. 248 for a discussion of estimated population per household).

COST/2/

Estimated project development costs would range between \$26.3 to \$28.9 million in 1983 dollars, including about \$20.7 million for land and construction costs and about \$5.6

- to \$8.2 million for professional services, financing, insurance and sales commissions. The condominium units are expected to sell for about \$200 per sq. ft., ranging in selling price from \$111,200 to \$316,000. The average unit selling price would be about \$150,000.

F. PROJECT APPROVALS

Following a public hearing on this Draft EIR before the City Planning Commission, responses to all written and oral comments will be prepared. Revisions to the Draft EIR (Summary of Comments and Responses) will be made over several months and will be reviewed by the City Planning Commission. After revisions are made to the satisfaction of the Commission they will certify the EIR as being adequate and complete. All of these steps have been completed (see Certification Motion, p. 219).

II. Project Description

The project sponsor will request a zoning reclassification from the existing RH-2 (House, Two-Family) Planning Code Use district to an RM-2 (Mixed, Moderate Density) district (see Figure 12, p. 25) and a Conditional Use authorization for a Planned Unit Development (PUD).^{/3/} Through the PUD, adjustments will be sought to City Planning Code requirements for rear yard location and for overall density. These requests require a public hearing which could be held anytime after the certification action, either the same day or later. Owners of property within 300 ft. of the site, neighborhood organizations and other interested persons will be notified by mail ten days in advance of the public hearing.

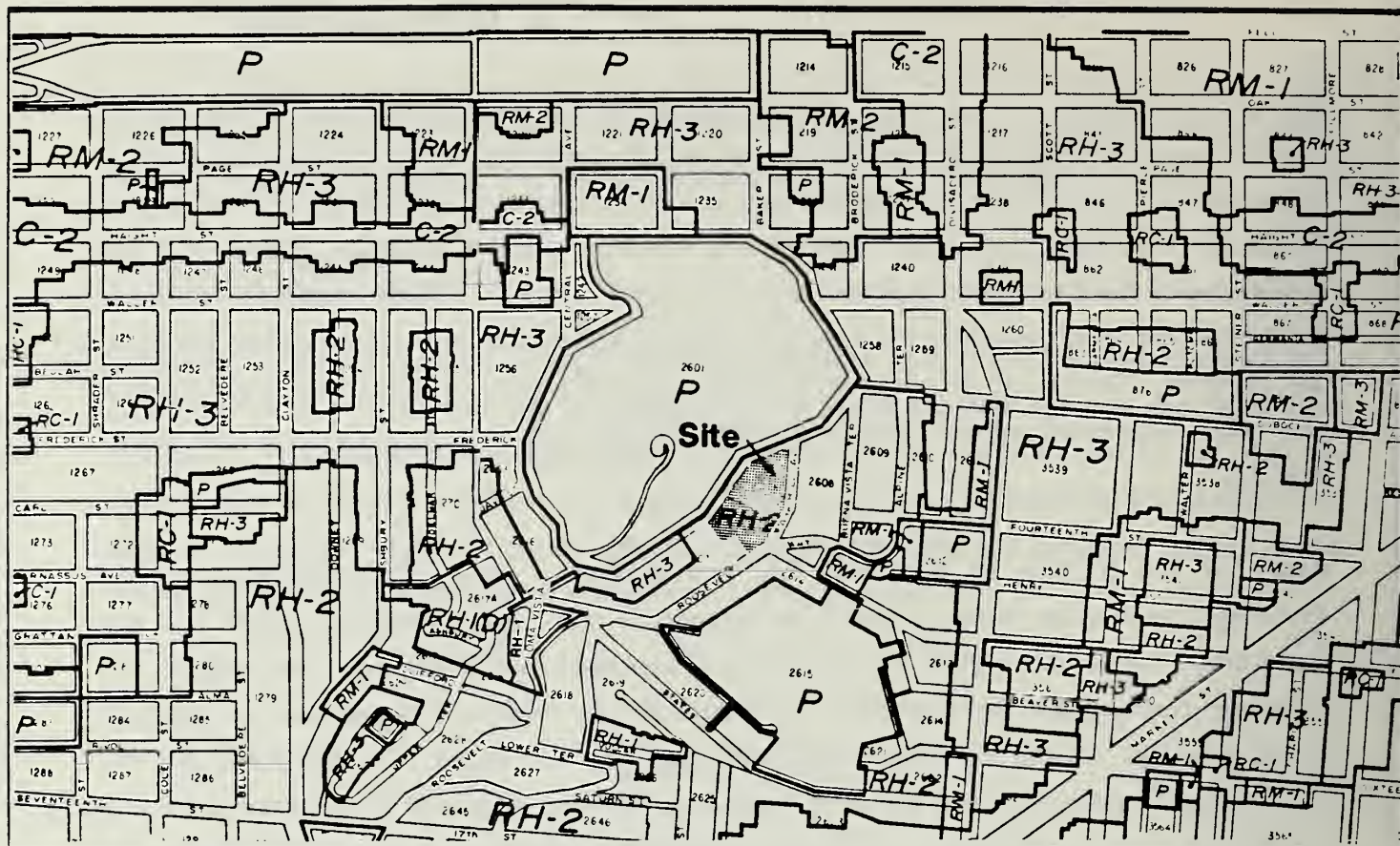
Based on the findings of the Final EIR and testimony at a public hearing, the City Planning Commission would approve or disapprove the zoning reclassification and the Conditional Use authorization for the PUD. If approved by the Planning Commission, the Planning, Housing and Development Committee of the Board of Supervisors would hold public hearings on the rezoning application and the full Board of Supervisors and the Mayor would approve or disapprove the reclassification. Approval or disapproval of the Conditional Use authorization would need no further action by the Board of Supervisors unless the City Planning Commission's action was appealed to them. If the project were to be approved, the project sponsor would then obtain building and related permits from the Central Permit Bureau of the Department of Public Works prior to the start of construction. Subdivision approval would be required prior to sale of condominiums units.^{/2/} The project sponsor and the Department of City Planning have met several times with residents of the Buena Vista neighborhood about environmental impact issues (see Appendix C, p. 250 for a list of meeting dates and community concerns).

NOTES - Project Description

/1/ Hans Groffie, Estimator, Williams & Burrows, Inc., General Contractors, letter, August 19, 1982. This letter is on file and available for public review at the Office of Environmental Review, 450 McAllister St., 5th Floor.

/2/ Stephen Koch, Project Manager, Prometheus Development Company, letter communication, March 4, 1983.

- /3/ Planned Unit Development (PUD) is defined by section 303 of the City Planning Code. The Code requires that a Planned Unit Development project be developed on sites of at least 1/2 acre. These projects must be developed as integrated units and designed to produce an environment of stable and desirable character which will benefit the occupants, the neighborhood and the City as a whole. Section 304 (a) of the City Planning Code further provides that, "In cases of outstanding overall design, complementary to the design values of the surrounding area, such a project may merit a well-reasoned modification of certain of the provisions" of the Planning Code."



LEGEND

- RH-1(D) Residential, House District, One-Family (Detached Dwellings)
- RH-1 Residential, House District, One-Family
- RH-2 Residential, House District, Two-Family
- RH-3 Residential, House District, Three-Family
- RM-1 Residential, Mixed District, Low Density
- RM-2 Residential, Mixed District, Moderate Density
- RM-3 Residential, Mixed District, Medium Density
- RC-1 Residential-Commercial Combined District, Low Density
- C-1 Neighborhood Shopping District
- C-2 Community Business District
- P Public Use District



FIGURE 12:
Existing Planning Code Use Districts

SOURCE: City of San Francisco Planning Code Zoning Map

III. ENVIRONMENTAL SETTING

A. VISUAL QUALITY AND SHADOWS

VISUAL QUALITY/1/

The project site is located on a visually prominent hilltop setting on Buena Vista Ave. East against the backdrop of Buena Vista Park to the west (see Figures 1 and 2, pp. 10 and 12). The site affords panoramic views of the City to the east and is visible from the Central Skyway (U.S. 101), from Market St. near 14th St., from the upper floors of downtown highrises and from the northeastern slope of Twin Peaks.

The architectural style of the hospital complex is Spanish Renaissance Revival./2/ The buildings have light ochre stucco facades and hipped red tile roofs. Existing buildings consist of one major building, a six-story hospital, and two ancillary buildings, a six-story convent and a one-story chapel (see Figures 13 and 14, p. 27-28). These buildings are connected by corridors, most of which are underground.

The 76-ft.-high hospital is located on the western boundary of the site. The building is an elongated rectangle, roughly parallel to Buena Vista Ave. East. It consists of a linear main wing and two extensions to the north which bend about 30 and 60 degrees, respectively, from the angle of the main wing. These two structural bends reflect the irregular shape of the site, which follows the contours of the Buena Vista Park hill and disguise the expansive length of the hospital (320 ft.). A one-story rectangular kitchen unit is located at the rear of the central portion of the main wing. The six-story hospital building does not reflect the character or scale of the surrounding Buena Vista neighborhood, which consists primarily of detached two- and three-story residential structures.

- The convent is located on the eastern boundary of the site, along Park Hill Ave. It is a multi-level rectangular structure nearly parallel to the hospital's main wing, with a partially tiled roof. The southern section is four stories (50 ft.) high, and the northern

III. Environmental Setting

section is six stories (75 ft.) high. The steep grade of the site, increasing in a northerly direction along Park Hill Ave., makes the convent appear taller from a southern perspective than its actual height. The convent is not visible from Buena Vista Ave. East adjacent to the hospital, as it is blocked by the 76-ft. high hospital building. The convent is partially visible from views north of the hospital.



FIGURE 13: View of Hospital Building from Buena Vista Ave, East Looking Eastward

From Park Hill Ave., the views of the convent are masked because of the grade separating Park Hill Ave. from the interior of the site and the mature trees located along the eastern perimeter of the site. From a distance, however, the convent is visible and contributes to the overall mass of the St. Joseph's Hospital complex.

The chapel is located at the southern end of the site, between the hospital and the convent (see Figure 14, p. 28). It consists of a group of sculptured masses with gently sloping tile roofs, round-headed windows and a small square cupola which serves as a belfry. The chapel is not visible from either Buena Vista Ave. East or Park Hill Ave., and is obscured from southern and northern viewpoints by mature landscaping. A 45-space, surface level parking lot is located in the northeastern interior portion of the site. It is roped off and is currently not in use. The lot is accessible from Buena Vista Ave. East and permits an unobstructed street-level view of Buena Vista Park from Park Hill Ave.

III. Environmental Setting

- The chapel building contains two and a half levels: a lower set of store rooms proposed for conversion into four units, and a balconied or split-level main floor proposed for conversion into three units. The architectural value of the building lies in the chapel itself whose murals and interior space were designed by Bakewell & Brown. The interior of the chapel is richly ornamented. It has a shallow central dome, half-round barrel vaults, and smaller concentric arches which contain stained glass windows on the north and south walls of the building. The western narthex supports a balustraded balcony. The chapel is entered from the main floor of the hospital building to the balcony or from the basement of the chapel through a vestibule with exterior doors to the narthex.
- The murals in the chapel appear to be painted directly on the plaster with which the entire chapel is surfaced. The main dome is a blue sky with three rings of stars centered on an eye symbol. Mural colors are muted tans, browns and terra cottas, with cream-colored sheep, white doves and muted blue and green accents. The floor of the chapel is marble. Stained and painted art glass fill two small round-headed windows at the rear of the balcony and the large windows in each transept./2/

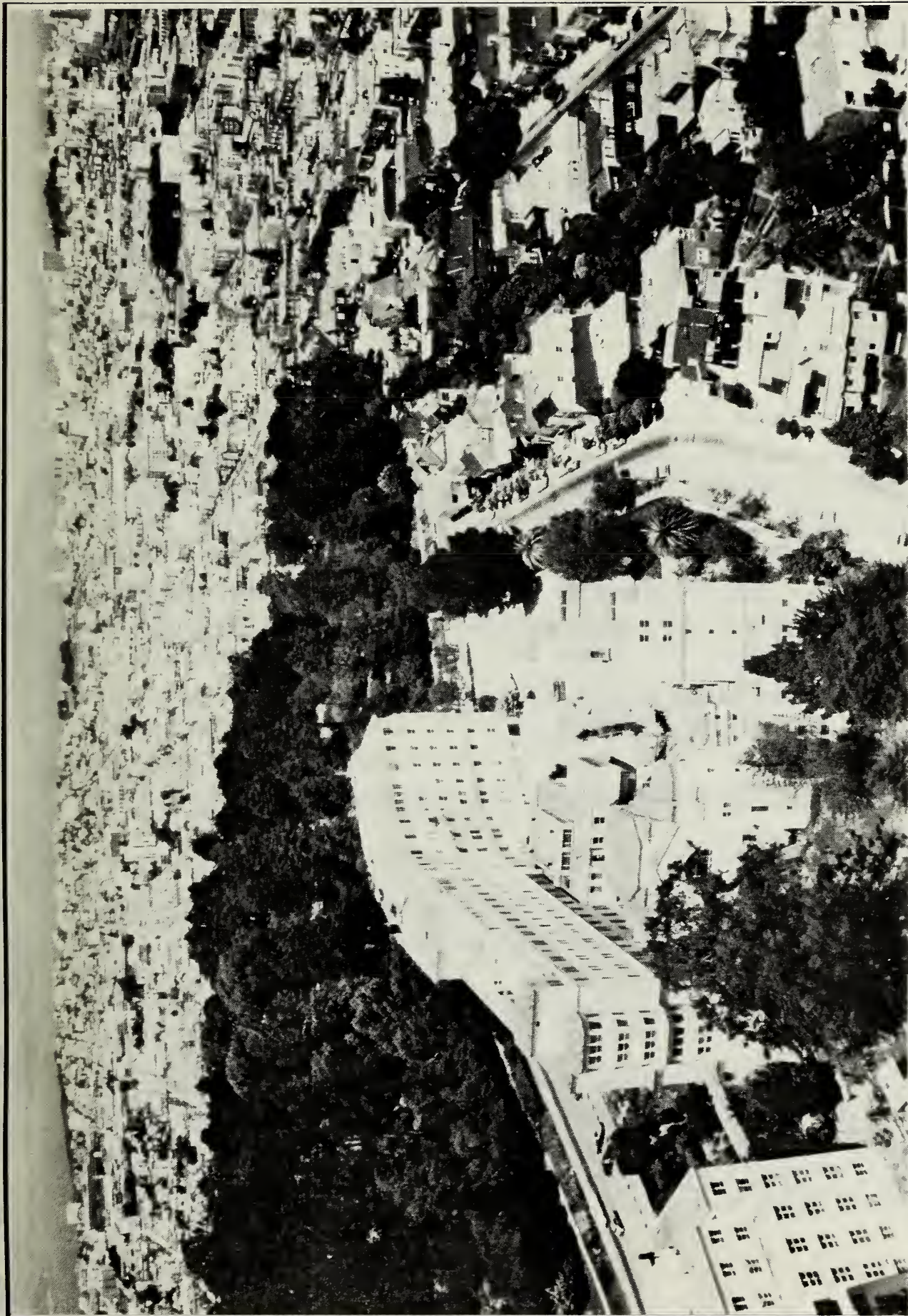


FIGURE 14: Aerial Photograph of St. Joseph's Hospital Complex
Looking North

SOURCE: Prometheus Development Company

III. Environmental Setting

A four- to ten-ft.-high concrete retaining wall surrounds most of the eastern and southern portions of the site. This wall separates the site from adjacent sidewalks and obscures pedestrian views into the interior of the site. Two stairways and a footpath entrance to the site are located along Park Hill Ave.; one stairway leads to the rear of the convent and the other stairway and footpath entrance lead to the surface-level parking lot. The south portion and perimeter of the project site are landscaped with flowers, shrubs and lawn areas. Several mature pine, cypress and palm trees on the site provide a parklike appearance (see also Section IV., Figures 17 and 18, pp. 42 and 44, respectively.)

● URBAN DESIGN POLICIES

The Urban Design Element of the San Francisco Master Plan characterizes the Buena Vista neighborhood as one of five areas in the city that are outstanding and unique (p. 26). The Urban Design Element on p. 27, describes the Buena Vista and Upper Market neighborhood as an area with:

- "Exceptional variety produced by differences in street patterns across an uneven chain of hills, and a diverse mixture of building styles and roof types;"
- "A finely scaled building pattern of small wall surfaces and pastel colors, with highly visible plantings on steep slopes;"
- "Hilltop parks easily seen from below, with excellent views of the City from a central location." and
- "Houses of varied sizes and individual forms having interesting setbacks, cornices and bay windows, many of notable architectural quality." (p. 27)

The Urban Design Element further states on p. 17:

"These (outstanding and unique) areas have an unusually fortunate relationship of building scale, landscaping, topography and other attributes that make them indispensable to San Francisco's image. Threats to the character of these areas are sure to be met with intense concern by their own residents and by the public at large."

Principle No. 4 for City Pattern states:

"Where large parks occur at tops of hills, lowrise buildings surrounding them will preserve views from the park and maintain visibility of the park from other areas of the City. Objective 1, Policy 14 states: 'Highly visible open space presents a refreshing contrast to extensive urban development.'"

- By its height and prominent hillside location, the existing hospital complex limits views of the lower southern slopes of Buena Vista Park as well as views of the City from Buena Vista Park.

SHADOWS (see also Appendix D, p. 252)

Along the project frontage, shadows are cast on Buena Vista Ave. East and Park Hill Ave. by the existing St. Joseph's Hospital buildings and landscaping. In the mornings (8:00 a.m.) during all seasons of the year, the hospital casts shadows across Buena Vista Ave. East onto the lower eastern slopes of Buena Vista Park. During midday (12:00 noon) in all seasons, Park Hill Ave. is in sunlight; portions of Buena Vista Ave. East are shaded by the hospital in spring, autumn and winter. In the afternoon (4:00 p.m.) in all seasons except summer, existing shadows cast by the hospital complex buildings on Buena Vista Park shade both sides of Park Hill Ave. On summer afternoons, a small portion of the project sidewalk (west side) and roadway on the northern part of Park Hill Ave. are shaded by the hospital, and the sidewalk and roadway in the southern part are shaded by the convent.

Shadow patterns extending off-site from existing site buildings for spring, summer, autumn and winter at 8:00 a.m., 12:00 noon, and 4:00 p.m. are presented in Figures 19, 20, and 21, pp. 47 - 51. (Only project shadows which extend off-site are shown.) The shading effects of mature trees, located on the project site along Park Hill Ave., on residences opposite the site were not taken into consideration in this analysis because of the variability of shadowing caused by differences in species density, form and configuration. Consequently, more shading of these residences occurs in the afternoons than is actually shown on the figures. Depth of shading into Buena Vista Park is presented as a worst case, as it assumes the park is flat and treeless. Because the park increases in elevation steeply from Buena Vista Ave. East and contains many trees, the shadows would extend onto the lower slopes of the Park and would not penetrate into the interior grounds.

NOTES - Visual Quality and Shadows

/1/ Parts of this section were summarized from the Nomination Form for the National Register of Historic Places Inventory completed May 6, 1982 for the Heritage Conservation and Recreation Service, United States Department of the Interior.

- /2/ Spanish Renaissance Revival Style refers to an architectural style which consists of the adaptation and development of Renaissance Architecture originating in Italy. Re-use of classical orders and a symmetrical composition is typical of these buildings. Characteristics include finely cut ashlar masonry, framed windows with mouldings, and doors supporting entablatures or pediments. Adobe bricks are commonly used for construction.
- /3/ Anne Bloomfield, Architectural Historian, letter, May 19, 1983.

B. TRANSPORTATION, CIRCULATION AND PARKING

The following section is based on the Park Hill Residential Transportation Study, prepared by Environmental Science Associates in October 1982. That study is hereby incorporated by reference into this EIR as provided by Section 15149 of the California Environmental Quality Act. The study is on file and available for public review at the Office of Environmental Review, 450 McAllister St., 5th Floor. Differences among data presented in that study and this Draft EIR are attributable to the availability of additional or more precise data during the subsequent preparation of the EIR.

STREETS AND VEHICULAR TRAFFIC

The site is bounded by Buena Vista Ave. East and Park Hill Ave. which are residential streets. The site is served principally by Buena Vista Ave. East, which loops southward from Haight St. around Buena Vista Park and forms the northern and western boundary of the site (see Figure 1, p. 10). On the eastern boundary, Park Hill Ave. connects Buena Vista Ave. East with Roosevelt Way; these three roadways are two-lane, two-way streets. Park Hill Ave. is steep (19% grade) along the 170-ft. segment north of Roosevelt Way. Intersecting Roosevelt Way east of the site are 14th and 15th Sts.; Duboce Ave. intersects Buena Vista Ave. East east of the site. Fourteenth and 15th Sts. and Duboce Ave. run east-west and connect the site with Castro and Market Sts. To the north, Buena Vista Ave. East provides access to Haight St. and via Baker St. to Oak and Fell Sts., which are a one-way, east-west pair of major thoroughfares. Central Skyway (US 101) on-ramps at Oak and Laguna Sts. and at South Van Ness Ave. and 13th St., provide access

III. Environmental Setting

to the U.S. 101, I-280 and I-80 freeways; Central Skyway off-ramps at Fell and Laguana Sts. exit from these freeways. Auto trips made on streets in the neighborhood of the site are generated primarily by residences in the area; other travel is associated with the present use of the project site by about 60 administrative employees of Children's Hospital, by the former St. Joseph's College of Nursing west of the site, and by recreational use of Buena Vista Park or the "49-Mile Scenic Drive" along Roosevelt Way.

III. Environmental Setting

Counts taken by Environmental Science Associates, show that p.m.-peak-hour weekday traffic (two-way) on Buena Vista Ave. East is about 200 vehicles per hour (an average of about one vehicle every 20 seconds); on Roosevelt Way (at 15th St. and Park Hill Ave.) it is about 500 vehicles per hour (one every 7 seconds)./1/ These volumes are light in relation to roadway and intersection capacity, which is approximately 1,500 vehicles per hour per lane. Peak-hour traffic on Park Hill Ave. is also light, about 30 vehicles per hour (one every 120 seconds)./1/ Drivers are seldom delayed by traffic volumes on these streets; there may be momentary delays when cars enter or cross Roosevelt Way from Park Hill Ave.

There are no signalized intersections in the project vicinity. Buena Vista Ave. East and Roosevelt Way do not have stop signs at their intersections with Park Hill Ave. A stop sign faces the Park Hill Ave. approach to Buena Vista Ave. East, but the Park Hill Ave. intersection at Roosevelt Way is uncontrolled and momentary delays are encountered by drivers on the southbound Park Hill Ave. approach.

TRAFFIC HAZARDS AND ACCIDENT RATES

- Many streets in the vicinity of the project are steep (grades of over 7%), with poor alignment and blind intersections. These factors impair circulation and parking and increase the risk of traffic hazards (see Figure 14a, p. 31b).

Lines-of-sight on Park Hill Ave. are impaired at a crest in the roadway because of the steep grade. At the intersection of Park Hill Ave. with Roosevelt Way, lines-of-sight are impaired when vehicles are parked on the north side of Roosevelt Way at the corner of the intersection. The Department of Public Works indicates that there are no current plans to

- change the parking alignment along Buena Vista Ave. East./2/ In 1975, The Department of City Planning prepared a background report on neighborhood rezoning in the Buena Vista area. That study indicates that "streets are often narrow and steep, thereby creating additional traffic problems." A feasibility report prepared for the site by John M. Sanger Associates also indicates that "the site has access and topographical constraints which make it less suitable for elderly occupants."

Accident data on Buena Vista Ave. East between Buena Vista Terrace and Upper Terrace, on Park Hill Ave., and on Roosevelt Way, between Buena Vista Terrace and

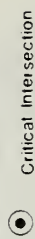
Museum Way are presented in Appendix E, Table E-1, p. 259. There were a total of 33 accidents during a five-year period (1977-81) on these roadway segments. On the basis of accidents per million vehicle mile (mvm), accidents were in the range of 4-30 per mvm. More detailed information would be required to determine if the accident rates in the project vicinity are excessive. The information needed for an analysis would include for each accident: time of day, weather conditions, type of accident (hitting a parked vehicle, a head-on collision, running off the road, etc.), and general roadway conditions. At the request of the City Attorney's Office, the Department of Public Works is not authorized to provide detailed accident information to the general public. Until such time as the information is available, no specific conclusions can be drawn from the accident rate data./3/

LEGEND

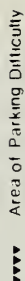


Road Gradient is
Greater than 17%
Road Gradient is
between 7% and 17%
Road Gradient is
Less than 7%

Intersection and Parking Problems
Identified by Buena Vista
Neighborhood Association



Critical Intersection



Area of Parking Difficulty

● FIGURE 14a:

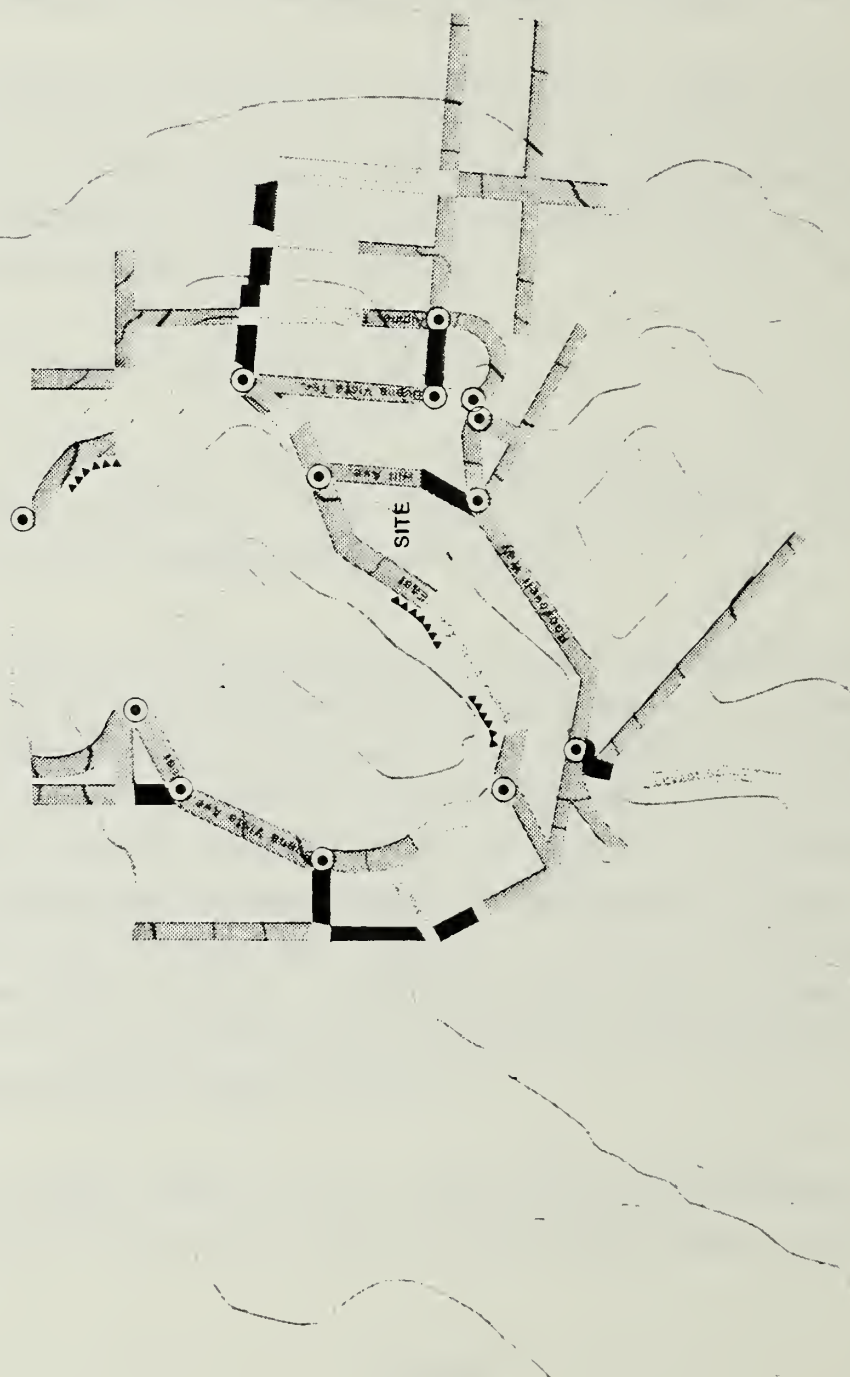
Road Gradients and
Critical Intersections
in the Site Vicinity

NOTE:

Contours are shown at 25 ft.
intervals.

SOURCE:

San Francisco Bureau of Surveys,
Buena Vista Neighborhood
Association, and Environmental
Science Associates, Inc.



PARKING SUPPLY/OCCUPANCY (see also Appendix E, pp. 253-266)

- Objective 3, Policy 1 of the Citywide Parking Plan states: "Regulate off-street parking in new housing so as to guarantee needed spaces without requiring excesses. Encourage low auto ownership in neighborhoods that are well served by transit and are convenient to neighborhood shopping."

Surveys of weekday and weekend parking supply and occupancy were conducted by Environmental Science Associates on both sides of the streets along the project frontage, the frontage of the former St. Joseph's College of Nursing, and all residential frontages within one block of the project site (see Figures E-1, E-2, and E-3 in Appendix E, pp. 256-258).

There are a total of about 97 curbside spaces along the project frontages on both sides of the street. There is curbside parking on both sides of Buena Vista Ave. East along the frontage of the project site. Perpendicular parking provides about 46 spaces on the south (project) side, and unmarked parallel parking on the north (opposite) side accommodates about 20 vehicles. (An existing surface-level lot on the site has about 45 marked parking spaces, but is currently roped off and not in use.) Unmarked parallel parking spaces along Park Hill Ave. can accommodate about 15 vehicles along the west (project) side and along the east side, about 16 vehicles. Neighborhood residents indicated that some of these spaces are avoided for parking because of the steep grade (19%) along the lower portion of Park Hill Ave./4/ In addition to the approximately 97 parking spaces provided along the project frontage or directly across from the site on Buena Vista Ave. East and Park Hill Ave., there are about 18 perpendicular parking spaces immediately in front of the former College of Nursing site.

Approximately 130 proper curbside spaces (not blocking a driveway) exist along residential and Buena Vista Park frontages in the immediate area, including Roosevelt Way between Buena Vista Terrace and Museum Way (57 spaces), 15th St. between Buena Vista Terrace and Roosevelt Way (11 spaces), Buena Vista Ave. East on the one-block segments between Upper Terrace and the College of Nursing site (31 spaces) and Buena Vista Ave. East, east of Park Hill Ave. (29 spaces). The 130 spaces include spaces on all of the residential and Buena Vista Park frontages within one block of any portion of the site on both sides of these streets, exclusive of the 31 spaces along the section of Park Hill Ave. next to the project site. Total estimated on-street parking supply in the area surveyed is about

III. Environmental Setting

245 spaces, including 97 curbside spaces along both sides of the street along the project frontage, 18 perpendicular spaces in front of the former College of Nursing, and the 130 spaces along residential frontages within one block of the site.

About 65% of the curbside parking along residential frontages in the area is occupied on weeknights, when demand is greatest. On weekends, afternoon use of curbside space was surveyed at 70-85% occupancy (see Appendix E, pp. 253-254, and Figures E 1-3, pp. 256-258).^{/5/} These parking surveys were conducted during August and October of 1982; these months include part, but not all, of the the peak-use period of Buena Vista Park which occurs from spring through late summer.

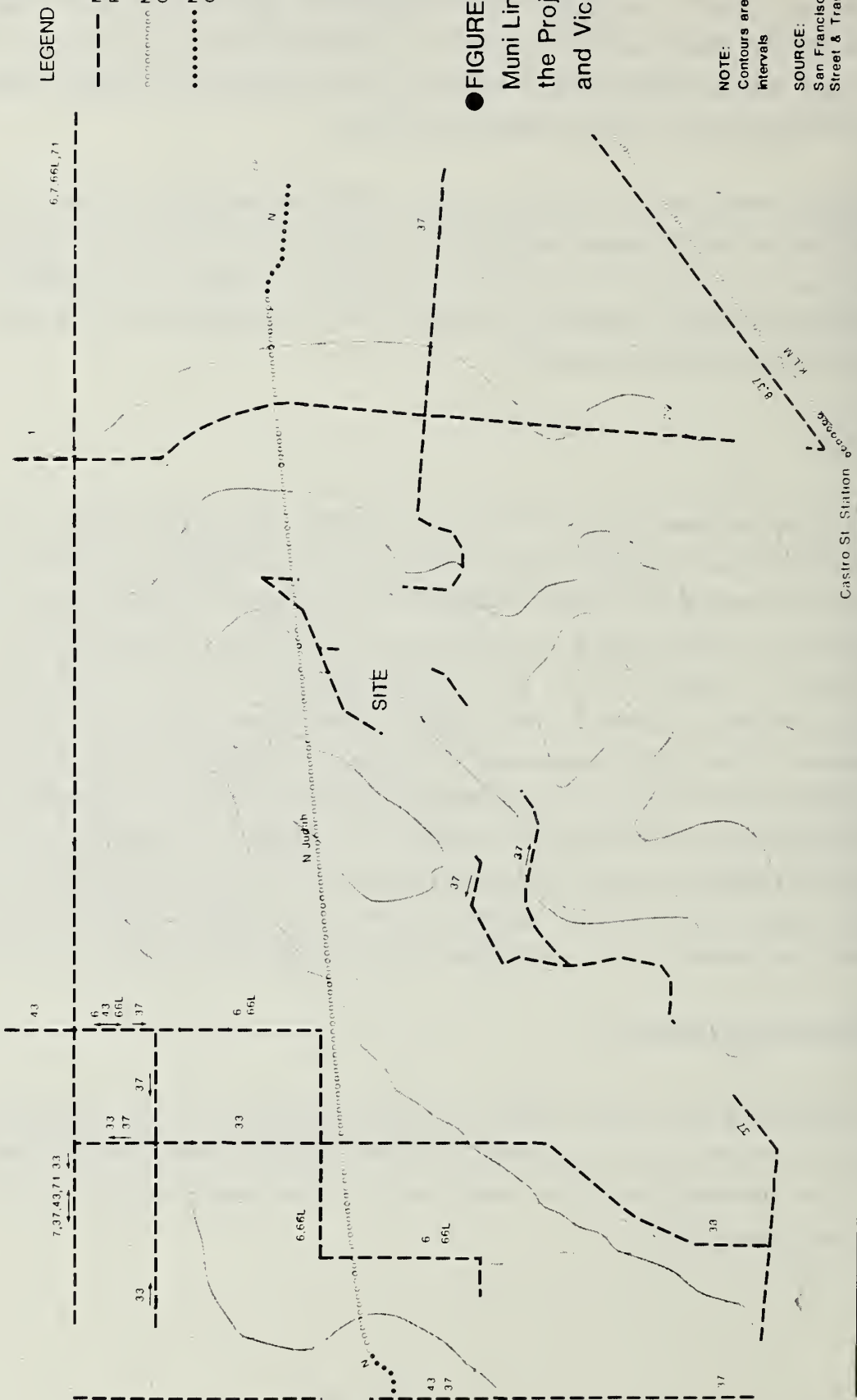
- Late-night (11:00-11:30 p.m.) parking surveys conducted along Buena Vista Avenue East showed that of the 94 spaces available an average of 12 vehicles are parked along or across from the site and in front of the College of Nursing. Thus parking is mainly associated with nearby residences; two service vehicles associated with the present use of the site were parked in this area.^{/6/}

TRANSIT

The site is served directly by the Muni No. 37 Corbett bus line (see Figure 15, p. 34). The No. 37 bus runs past the project site on Buena Vista Ave. East and on Park Hill Ave., with stops at the intersection of these streets, every 15 minutes during commute hours. The 37 Corbett line connects the site with Muni lines on Haight St. and on Castro St., and with the Church St. Station of the Muni Metro, served by the K, L, and M lines. The 24 Divisadero line on Castro St. has a stop at 14th St., four blocks east of the site. The 6 Parnassus, 7 Haight, 66 Quintara, and 71 Noriega on Haight St. stop at Buena Vista Ave. East, three blocks north of the site. These lines run downtown, with peak-hour headways (time interval between buses) of 6-15 minutes. The elevation of the project site above the level of both Haight and Castro St. (some grades of 10%) may preclude walking directly to transit stops on these streets by some project area residents; however, neighborhood residents can transfer from the 37 Corbett line to bus lines on Haight St. and Castro St.

PEDESTRIANS/BICYCLES

Few pedestrians were noted during the weekday peak-hour traffic counts; there were fewer than ten per hour on any sidewalk or path. Bicyclists were less in evidence; fewer than five bicyclists per hour were seen in the area bounded by the parking supply/occupancy survey.



NOTES - Transportation, Circulation and Parking

/1/ Manual traffic counts were made on Monday, August 9 and on Friday, August 13, 1982, between 4:30 and 5:45 p.m. Weather conditions on these days were clear with moderate temperatures. Peak-hour refers to the most heavily traveled hours, which occur between 7:00 a.m. and 9:00 a.m. in the mornings and 4:00 p.m. and 6:00 p.m. in the afternoons.

/2/ Russell Lee, Department of Public Works, telephone conversation, March 2, 1983.

/3/ Nelson Wong, Associate Traffic Engineer, Department of Public Works, Bureau of Engineering, Division of Traffic.

/4/ Community Meeting, February 23, 1983.

/5/ Parking surveys were made at 4:00 and 6:00 p.m. on Monday, August 9 and on Friday, August 13; at 9:00 p.m. on Tuesday, September 14, 1982; and at 4:00 p.m. on Sunday, August 15, 1982 and Sunday, September 26, 1982. Weather conditions on all of these days were clear with moderate temperatures. Sunday, September 26, 1982, followed two days of rain. Although the grounds of Buena Vista Park were moist, neighborhood streets and the tennis courts and paths at Buena Vista Park were dry.

/6/ Late night parking surveys were conducted between 11:00 and 11:30 p.m. during the week of February 10-16, 1983. Weather conditions were clear on all nights. A copy of these surveys are on file and available for public review at the Office of Environmental Review, 450 McAllister St., 5th Floor.

C. PARK AND RECREATION FACILITIES

The project site is located in the vicinity of several neighborhood parks (see Figure 16, p. 36). Buena Vista Park is located immediately to the northwest of the project site. Most of this 36-acre park consists of densely wooded, hilly areas interspersed with pathways. Park facilities include two tennis courts and a children's play area. The tennis courts are often crowded during peak-use periods which occur in the late afternoon during summer months and on weekends. Tennis players at these courts have been observed waiting up to an hour to play during these peak-use periods./1/ The Recreation and Park Department currently has no plans under consideration, nor funding available, for construction of additional tennis courts at Buena Vista Park./2/

In 1978, the Recreation and Park Department formulated a master plan for Buena Vista Park, a process which included extensive community participation. Recommendations emphasized erosion control and pathway improvements.



SOURCE: Base map reproduced by permission of California State Automobile Association, copyright owner.

FIGURE 16: Parks and Open Space in the Vicinity of the Project Site

A Department of City Planning report titled "Recreation and Open Space Programs" was published in July of 1973. It consists of recommendations for implementing the Recreation and Open Space Element of the Comprehensive Plan of San Francisco. Recommendations made for Buena Vista Park include more lighting, better maintenance of existing lighting, more frequent police patrols, and preservation of the visual and natural qualities of the park.

Corona Heights Park contains about 16 acres, two of which are developed. It is located about one block southeast of the project site. The park contains two tennis courts, the Sidney Peixotto courts. It is also the site of the Junior Museum. The undeveloped area consists of a flat grassy area and a rocky hilltop. During warm, sunny weather the grassy area is used for sunbathing and the hilltop for climbing.

III. Environmental Setting

Duboce Park is located about five blocks northeast of the project site. This 10-acre park consists of about a two-block, relatively flat, grassy area. Other recreational facilities in the project vicinity include two outdoor public tennis courts located at States St., about six blocks southeast of the project site (immediately south of Corona Heights Park). Tennis players at the State St. courts and the Sidney Peixotto courts in Corona Heights Park experience waits similar to those at Buena Vista Park./1/

Golden Gate Park is located about ten blocks west of the project site. It provides a full range of park facilities, including ball fields, hiking trails and tennis courts.

Objectives of the Recreation and Open Space Element of the San Francisco Comprehensive Plan include, "Providing opportunities for recreation and enjoyment of open space in every San Francisco neighborhood". Policies of this objective include: to make better use of existing facilities, to acquire new park and recreation space to serve San Francisco's residential neighborhoods and to give high priority for recreation improvements to high-need neighborhoods. The Buena Vista neighborhood is not identified in the plan as a high-need neighborhood for additional recreation and open space facilities.

NOTES - Park and Recreation Facilities

/1/ Environmental Science Associates, Field Observations, Summer 1982.

/2/ Deborah Learner, Planner, San Francisco Recreation and Park Department, letter, September 8, 1982, to Paul Rosetter, Office of Environmental Review. This letter is on file and available for public review at the Office of Environmental Review, 450 McAllister St., 5th Floor.

D. ENERGY

LOCAL ENERGY SUPPLY

Electricity and natural gas are supplied to San Francisco by Pacific Gas and Electric Company (PGandE). New demands for electricity in northern California will be met primarily with energy derived from coal, nuclear, and hydroelectric sources. Cogeneration (i.e., production of electricity from waste heat generated by industrial processes) wind turbine generators and additional geothermal power development also will supplement existing supplies.

III. Environmental Setting

Among the major new power plants PGandE plans to bring on line are the Diablo Canyon nuclear plant and the Helms Pump Storage hydroelectric plant. PGandE plans to have both facilities on line by Fall 1983. PGandE also plans increased purchases of electricity from other utilities. This power is expected to come from surpluses generated by hydroelectric and nuclear plants in the State of Washington. These surpluses are uncertain because of the recent cancellation of plans for two of the five Washington Public Power Supply System nuclear plants, the delay in construction of another, and long-term increased local demand for energy in the Pacific Northwest.

PGandE has long-term agreements with Southern California utilities (California Power Pool Agreement) and Pacific Northwest utilities (Pacific Northwest - Southwest Intertie) for energy pooling, exchange, and purchase that will be used, in part, to meet future peak-period demand.

ON-SITE ENERGY CONSUMPTION

Existing energy consumption at the site is associated primarily with the 60 employees of Children's Hospital who currently work at the site. Energy consumption data for the existing use of the hospital building are available from November 1981 through November 1982./1/ Energy consumption between November 23, 1981 and November 22, 1982 was 4,129 therms of natural gas and 373,950 kilowatt hours (kWh) of electricity, a total of 4.3 billion at-source Btu./2/ During this period, however, the convent and chapel buildings were vacant and the hospital building was not in full use; energy consumed during this one-year period is much less than that which would be consumed if the buildings were in full operation.

ENERGY CONSERVATION REGULATIONS, PLANS, AND POLICIES

Energy efficiency of new development in San Francisco is regulated at the state level through building energy efficiency regulations and at the City and County level through ordinances, plans, and policies. See Appendix F, p. 267, for a discussion of these policies.

NOTES - Energy

/1/ Information obtained from PGandE records, November 23, 1981 to November 22, 1982.

III. Environmental Setting

/2/ The British Thermal Unit (Btu) is a standard for measuring heat. Technically, it is the quantity of heat required to raise the temperature of 1 pound of water 1° Fahrenheit at sea level. The term "at source" means that adjustments have been made in the calculation of the Btu energy equivalent to account for losses in energy which occur during generation and transmission of the various energy forms as specified in: ERCDC, 1977, Energy Conservation Design Manual for New Nonresidential Buildings, Energy Resource Conservation and Development Commission, Sacramento, CA; and Apostolos, J.A., W.R. Shoemaker, and E.C. Shirley, 1978, Energy and Transportation Systems, California Department of Transportation, Sacramento, CA Proj. #20-7 Task 8.

IV. ENVIRONMENTAL IMPACT

An Initial Study of the proposed project was published October 22, 1982, and a determination was made that an Environmental Impact Report (EIR) was required. Issues that were considered to require no further discussion as a result of the Initial Study include: land use, employment/housing, noise, air quality/climate, utilities and public services, biology, geology, hydrology, hazards, and cultural factors. The Initial Study is incorporated herein as Appendix A, p. 222, and may be referred to for a discussion of those issues.

A. VISUAL QUALITY AND SHADOWS

VISUAL QUALITY

New Construction

- The proposed new construction would be located in the northeastern portion of the site, parallel to, but set back from, Park Hill Ave (see Figure 2, p. 12). An 18-inch diameter cypress tree would be removed from the site of the new construction. The new construction would incorporate several design elements that are common to the Mission Revival Style such as round arches and red-tile roofs. These features would complement the existing hospital complex, built in a Spanish Renaissance Revival style. The color of the new townhouse structures would be light; the windows, small-scaled and rectangular; and the roofs hipped and tiled. Balconies and ironwork ornamentation on the new construction would be similar to existing and proposed ironwork on the existing buildings (see discussion of existing buildings below).
- The new townhouse buildings would increase in height from two to four stories (26 to 44 ft. high) in a northerly direction. The average height of the new townhouse structures would provide an intermediate transitional scale between Park Hill Ave. and the hospital building which is 76 ft. high.

- However, the scale of the new construction would differ from the homes on Park Hill Ave. in that the townhouse structures would be attached and would be 10 to 24 ft. higher above ground level than the existing houses. The new construction would limit views of the lower slopes of Buena Vista Park, the lower portion of the hospital building and interior portions of the site, from both street level and residences north of the bend in Park Hill Ave. Existing views to the north and west below (south of) the bend are mostly obscured by the existing four- to ten-ft.-high retaining wall, the convent and landscaping.

The townhouse structures would be set back to preserve much of the existing landscaping along Park Hill Ave. New landscaping would be interspersed with existing trees and vegetation to further remove the new construction from views from nearby residences.

- The upper portions of the proposed new construction, particularly of the four-story townhouse structures, would be visible as a staggered line of pitched, tile roofs from second and upper stories of residences along Park Hill Ave. The new construction would lessen the park-like appearance of the site when viewed from street level on Park Hill Ave. Existing and proposed landscaping would partially obscure the facades of the new townhouse structures (see Figures 17 and 18, pp. 42-44. From distant easterly views, the proposed townhouse buildings would be screened by mature landscaping along Park Hill Ave.

On-site parking would be underground, beneath the proposed townhouse structures; the parking structure would be partially visible near the intersection of Park Hill Ave. and Buena Vista Ave. East. No parking driveway would be provided adjacent to or across from a residential street. This would be responsive to Policy 4 of the Urban Design Plan of the San Francisco Comprehensive Plan, which encourages that walkways and parking facilities be designed to minimize danger to pedestrians.

Provision of underground parking would allow for development of interior private open space. Except for the internal driveway, interior open spaces would be terraced gardens that would provide decorative paving, and retaining walls and stairs with dense planting. Inclusion of landscaping in the project would respond to Policy 12 of the Urban Design Plan: to install, promote and maintain landscaping in public and private areas./1/ The interior landscaping is intended by the project architect to promote sitting, strolling and sunning by project residents. This would address Policy 10 of the Urban Design Plan: to encourage or require the provision of recreation space in private development.

Existing Buildings

The hospital, convent and chapel buildings would be rehabilitated structurally to meet the City's Life Safety and Building Code standards, including seismic standards. To bring the convent into conformance with seismic requirements, a 16-ft.-wide addition with exterior shear walls would be constructed on the west facade of the convent building. The addition



Convent Building

Cypress Tree
(to be removed)

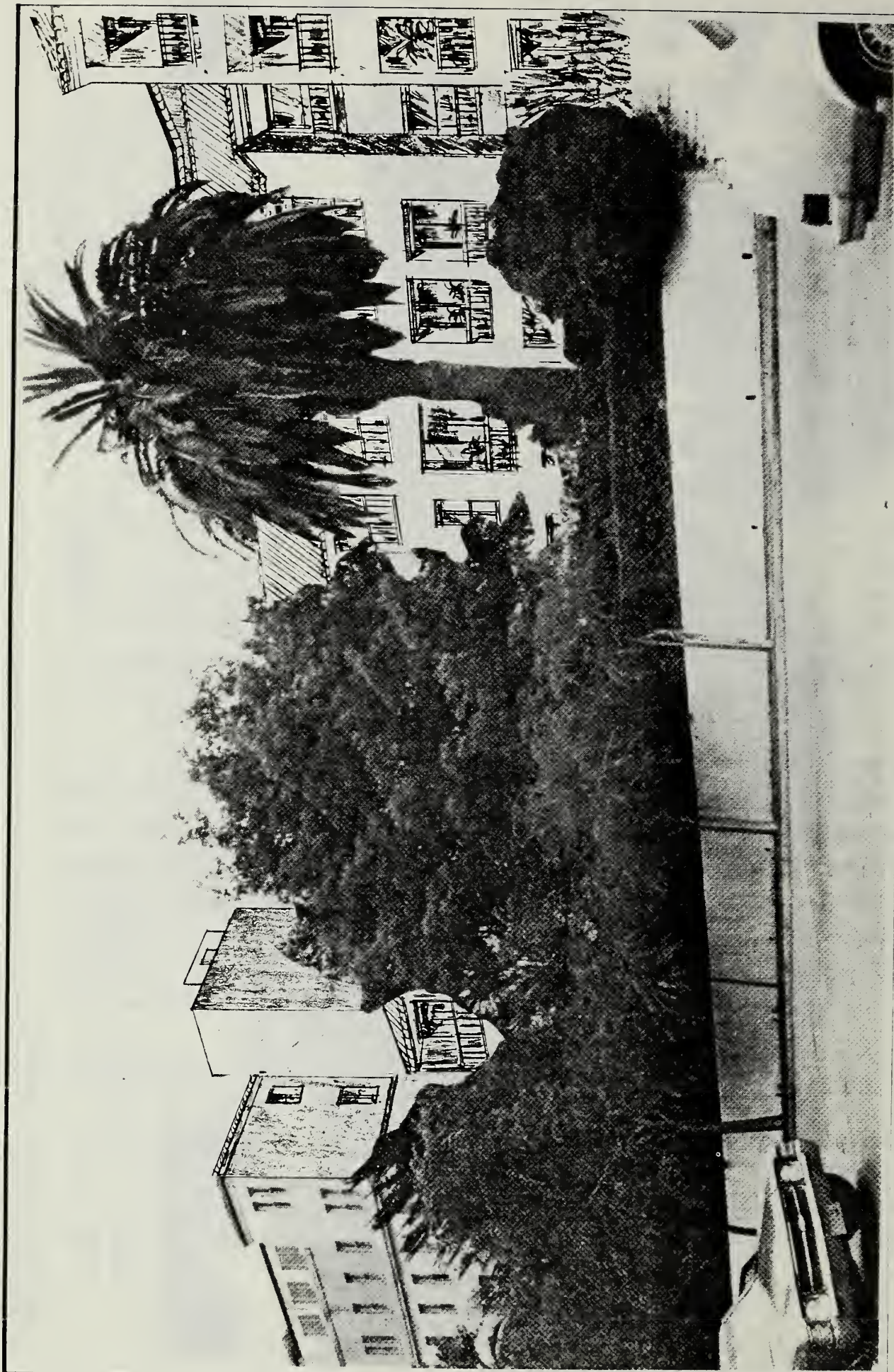
Stairwell of
Convent Building

Kitchen Unit

Hospital Building

FIGURE 17: Existing View of the Site Looking West from Park Hill Ave.

SOURCE: Kaplan/McLaughlin/Diaz



Convent Building

Existing Stairwell of Convent Building

New Townhouse Structures

Existing Stairway (to be removed)

FIGURE 17a: Photomontage of New Construction

Looking West from Park Hill Ave.

SOURCE: Kaplan/McLaughlin/Diaz

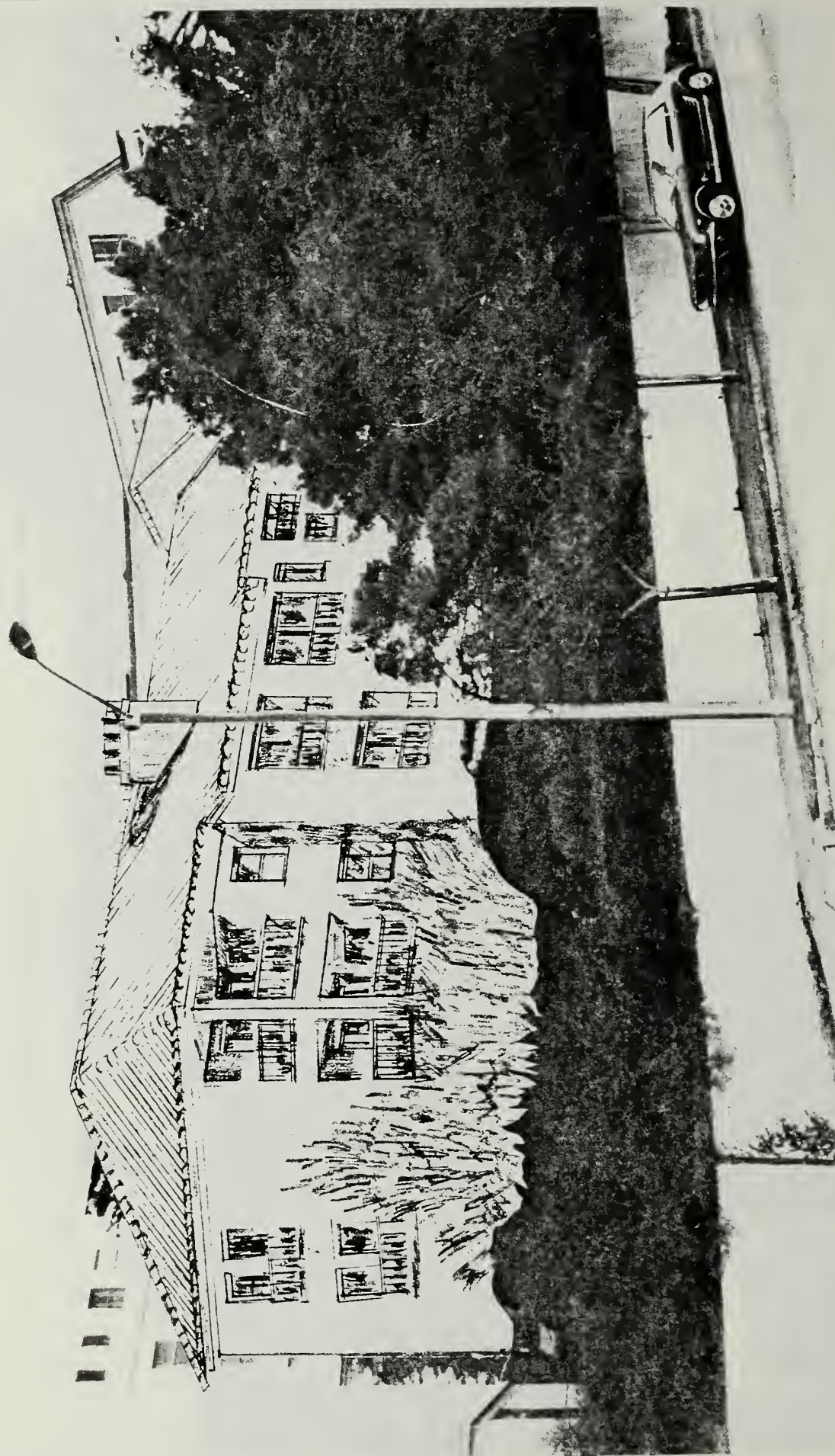


Hospital Building

← Cypress Tree to be Removed →

FIGURE 18: Existing View of the Site Looking
Northwest from Park Hill Avenue

SOURCE: Kaplan/McLaughlin/Diaz



— New Townhouse Structures —

FIGURE 18a: Photomontage of New Construction
Looking Northwest from Park Hill Avenue

SOURCE: Kaplan/McLaughlin/Diaz

- to the convent would be 50 ft. in height, amounting to about 4,900 sq. ft. of habitable floor area on five floors (see Figure 5, p. 15). Proposed changes to the exterior of the hospital building include selective enlargement of windows and the addition of exterior embellishments such as balconies and facade ornamentation on the east-facing facade. Exterior changes to the chapel could include the addition of small windows to provide light to interior areas that were previously used for storage. The existing stairway and footpath entrance on Park Hill Ave. (next to the site of the new townhouse construction) would be eliminated to discourage pedestrian or vehicle access to the site from Park Hill Ave. The existing stairway located at the southern end of the convent building would be
- retained but secured from pedestrian access. Development of the chapel building into residential units would alter the interior of the chapel, including possible elimination of the murals (see p. 27 for a description of the murals).
 - The conversion of St. Joseph's Hospital to housing would comply with the Secretary of the Interior's Standards for Rehabilitating Historic Structures; in the opinion of the Landmarks Preservation Advisory Board this would minimize the effects that residential conversion would have on the cultural resource value of the hospital complex. It is the opinion of the Landmarks Preservation Advisory Board that retention and reuse of the former St. Joseph's Hospital, a structure determined eligible for the National Register of Historic Places, would enhance the complex as a cultural resource.

SHADOWS

Figures 19, 20, and 21, pp. 47 to 51, show existing and new shadows cast on Park Hill Ave. and Buena Vista Ave. East by the proposed townhouse structures; all times in these figures represent Standard Time (ST). As creation of new on-site shadows is not considered a project impact, only on-site shadows which extend off-site are presented in Figures 19, 20, and 21. No shadows would be cast off-site from the convent addition. The methodology for determining the angle and length of existing and project shadows is discussed in Appendix D, p. 252. As discussed in the Setting Section, p. 29, the shadows created by mature trees along Park Hill Ave. were not considered in these projections; consequently, afternoon shadows generated by the new construction on residences across Park Hill Ave. represent worst-case shadow effects. The shading of Buena Vista Park is

also presented as a worst case, as the upward slope of the park from Buena Vista Ave. East and the filtering effect of existing trees in the park reduce the extent and density of shadows on the park.

The new townhouses along Park Hill Ave. would cast additional shadows on Buena Vista Ave. East and a portion of Buena Vista Park on winter, spring, and fall mornings (8:00 a.m.). On Buena Vista Ave. East the new structures would shade the project sidewalk (southeast side) and a small portion of the roadway on summer mornings; no residences would be shaded during this time.

At midday (12:00 noon) in December, the townhouses would cast shadows northward across Buena Vista Ave. East onto the northern sidewalk of Buena Vista Ave. East. In spring and fall, these shadows would shorten, shading only the project sidewalk (south side) and a small part of Buena Vista Ave. East. (Text is continued on p. 51.)

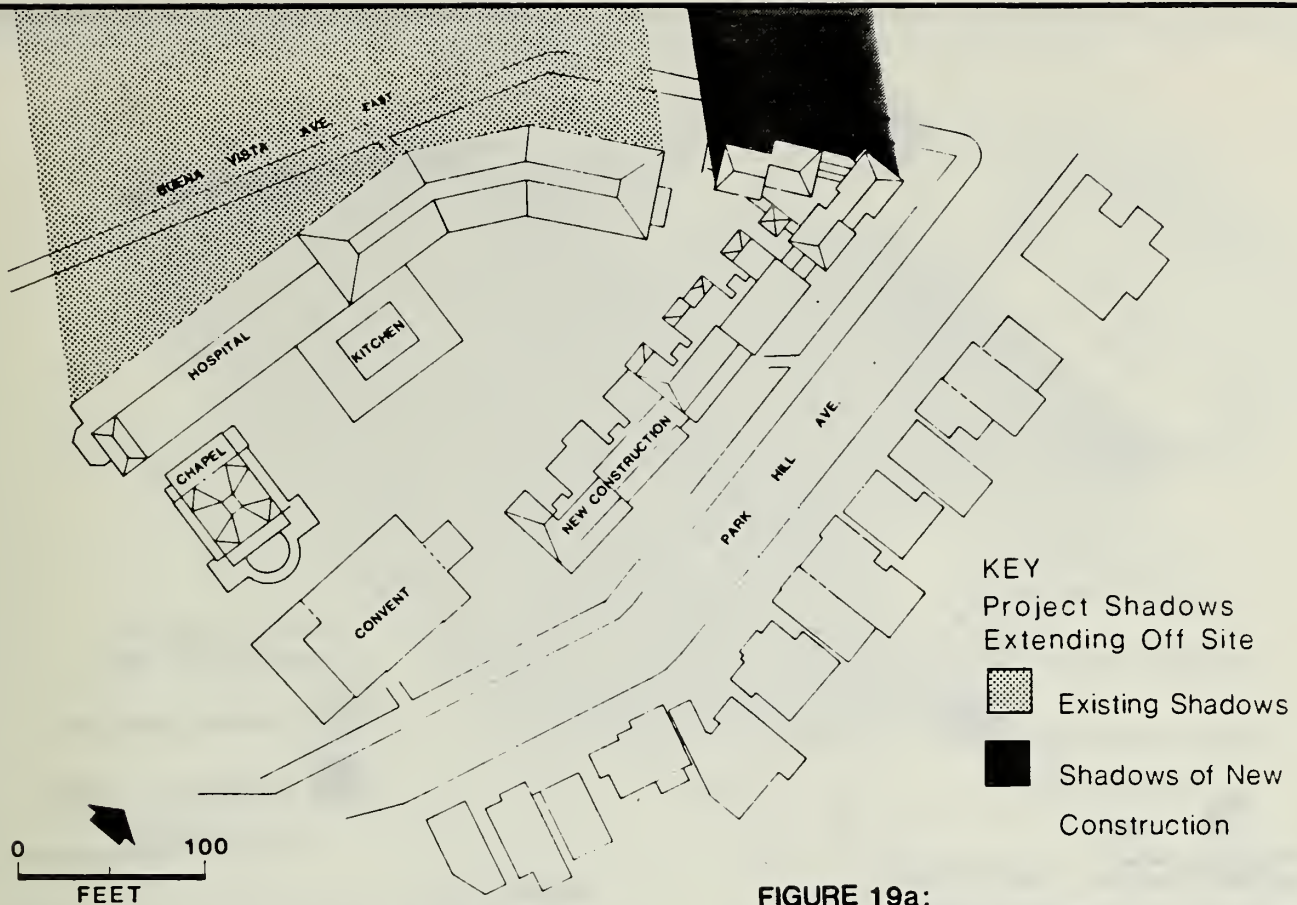


FIGURE 19a:

Shadow Diagram, December 22, 8:00 A.M.

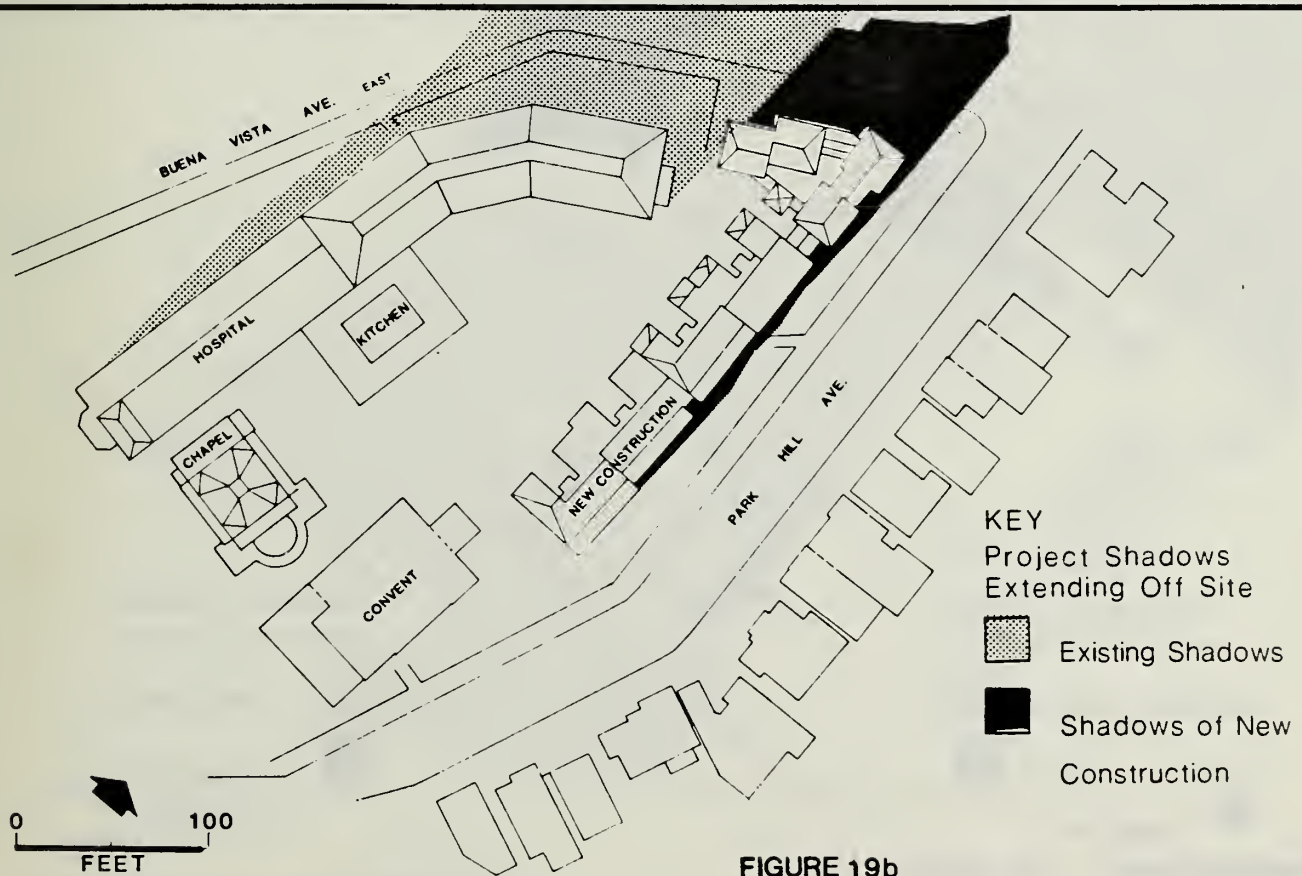


FIGURE 19b

Shadow Diagram, December 22, 12:00 Noon

SOURCE: Environmental Science Associates, Inc.

SOURCE: Environmental Science Associates, Inc.

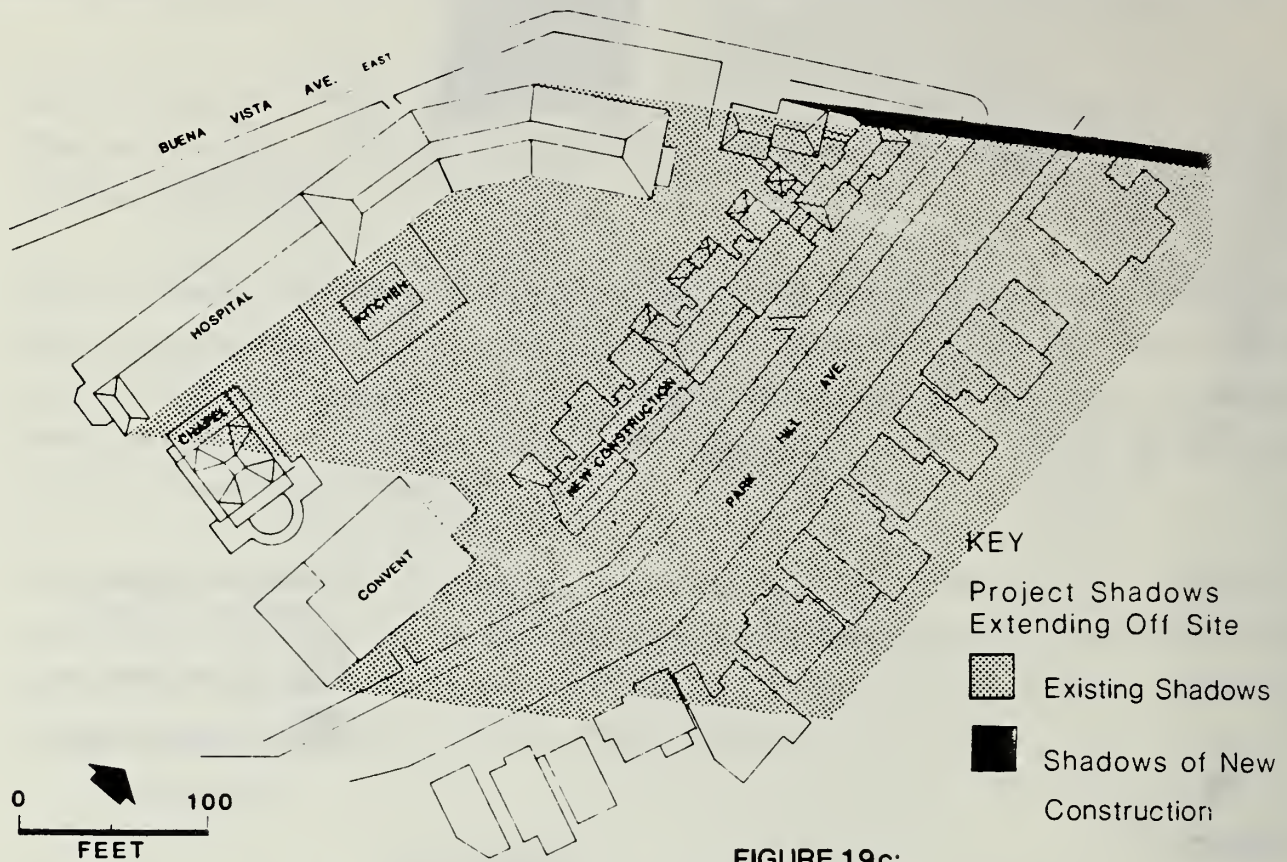


FIGURE 19c:

Shadow Diagram, December 22, 4:00 P.M.

SOURCE: Environmental Science Associates, Inc.

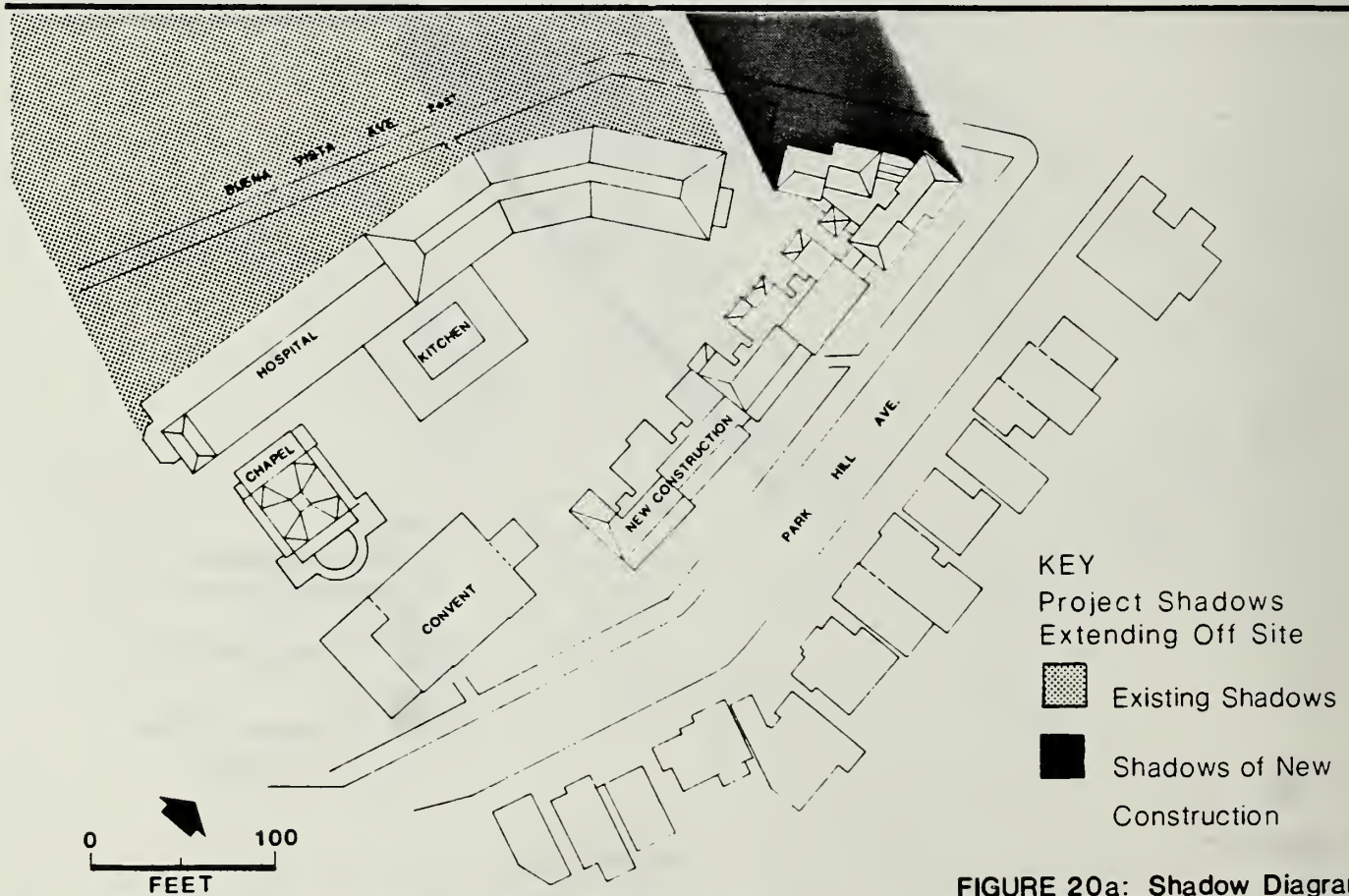
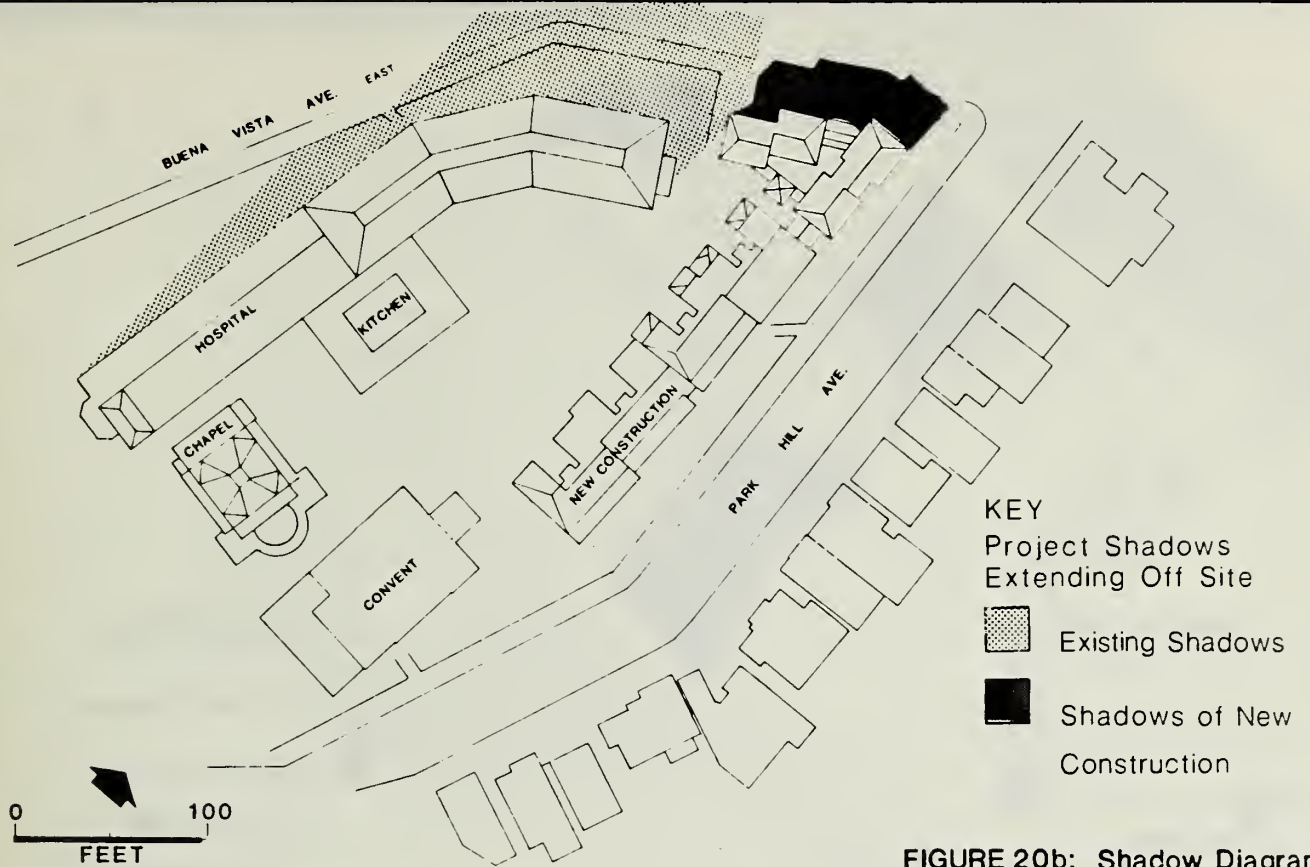


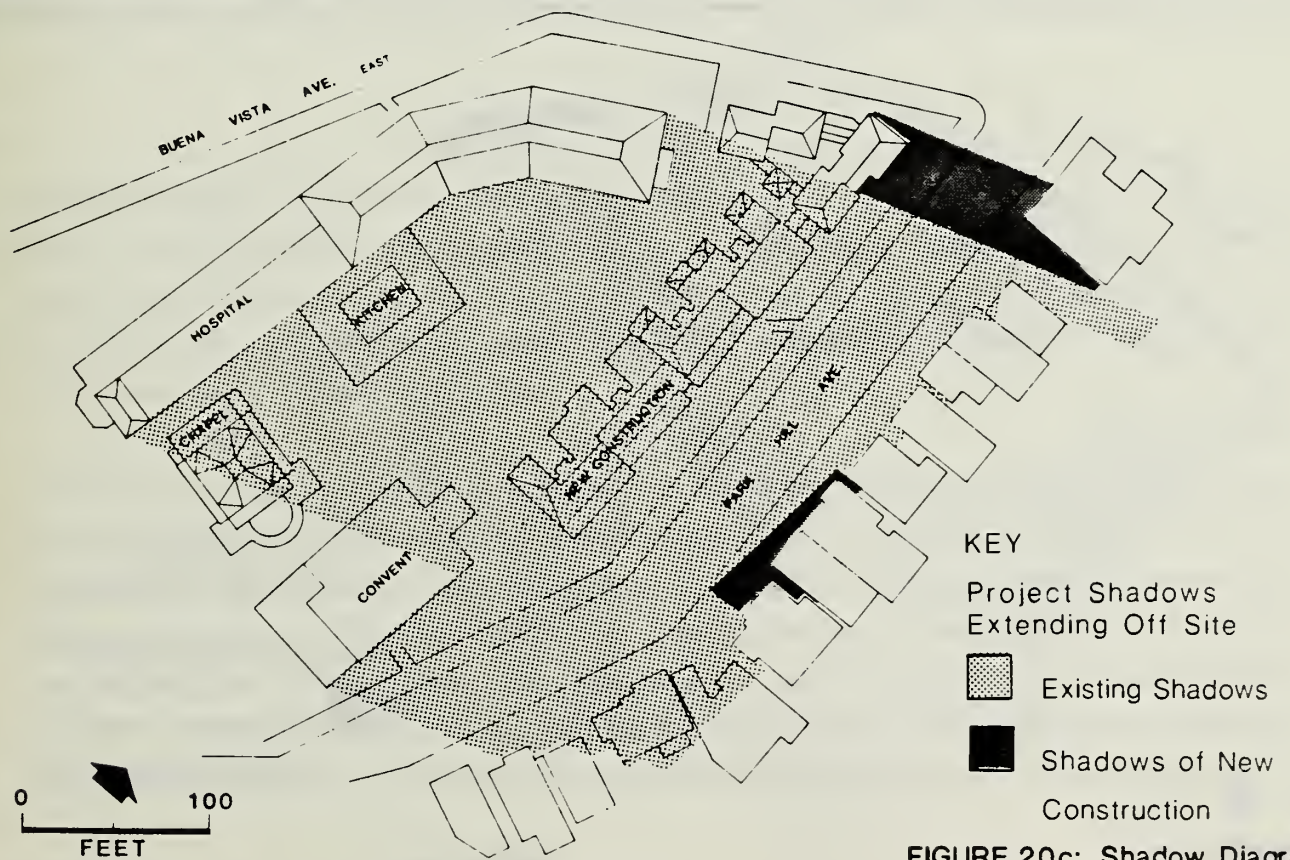
FIGURE 20a: Shadow Diagram,
March/September 8:00 A.M.

SOURCE: Environmental Science Associates, Inc.



**FIGURE 20b: Shadow Diagram,
March/September 12:00 Noon**

SOURCE: Environmental Science Associates, Inc.



**FIGURE 20c: Shadow Diagram,
March/September 4:00 P.M.**

SOURCE: Environmental Science Associates, Inc.

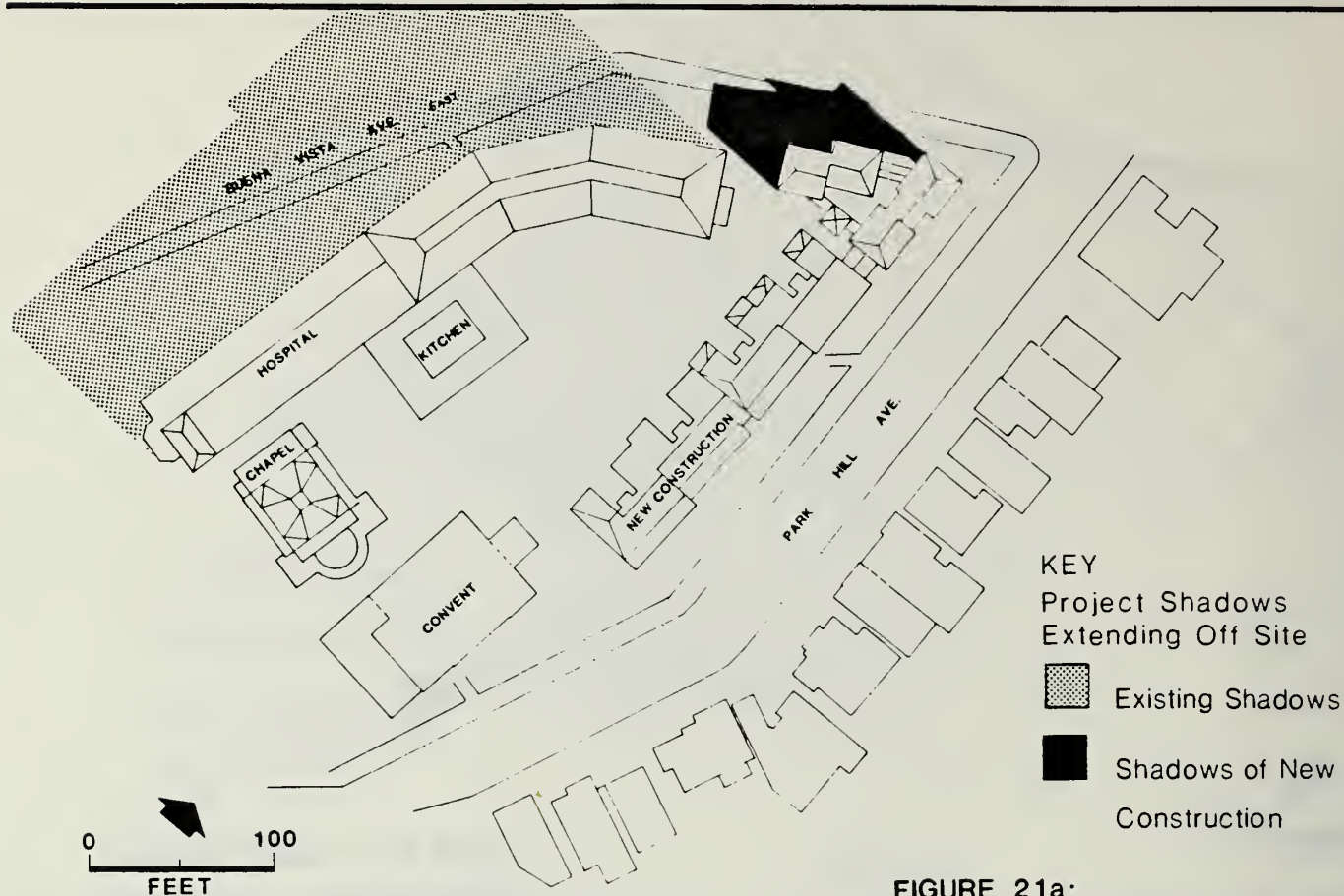


FIGURE 21a:
Shadow Diagram, June 22 8:00 A.M.

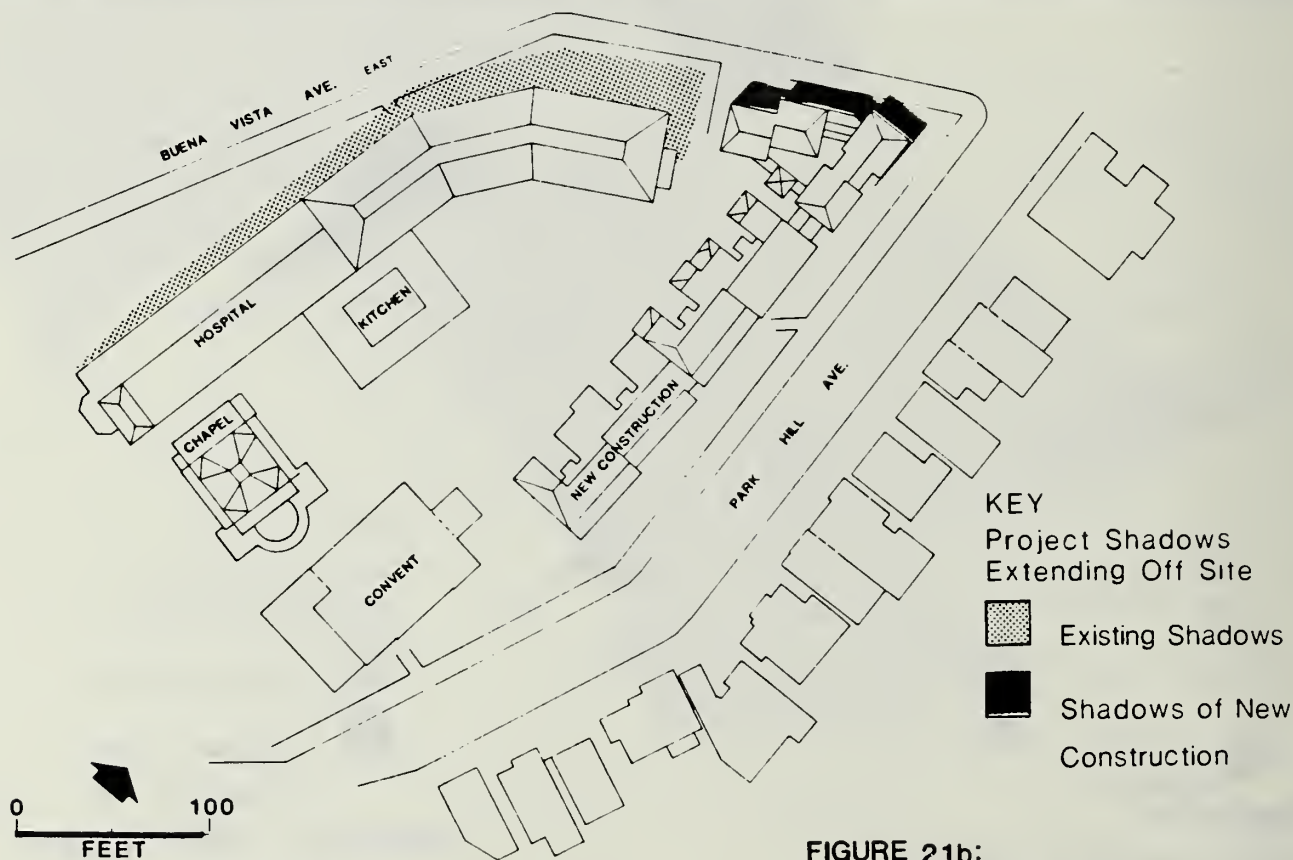


FIGURE 21b:
Shadow Diagram, June 22, 12:00 Noon

SOURCE: Environmental Science Associates, Inc.

SOURCE: Environmental Science Associates, Inc.

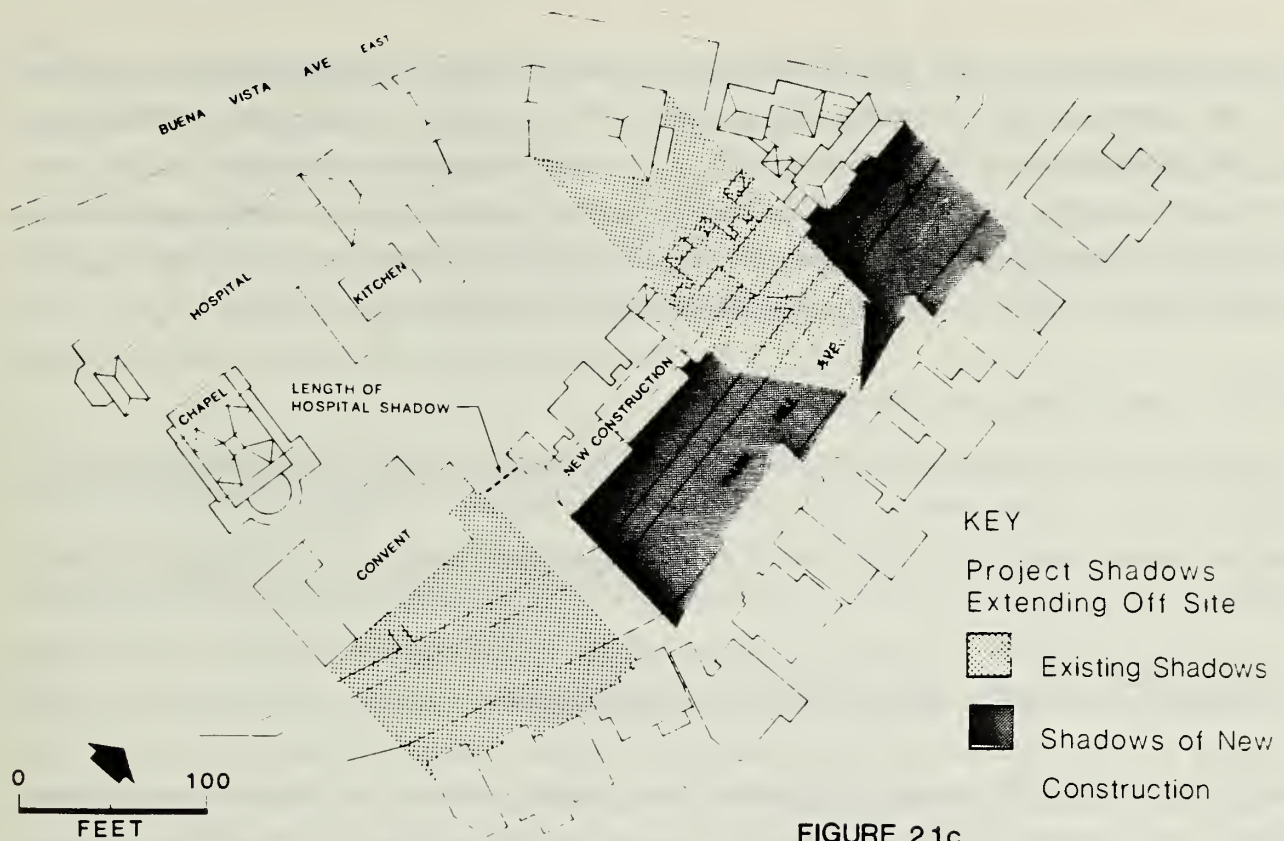


FIGURE 21c

Shadow Diagram, June 22, 4:00 P.M.

SOURCE: Environmental Science Associates, Inc.

During summer no shadows from new construction would be cast off-site, except at 8:00 a.m. and 4:00 p.m. when shadows would extend onto the eastern (project side) of Buena Vista Ave. East, and onto the northwestern sidewalk (project side) and roadway of Park Hill Ave., respectively. In spring and fall around 4:00 p.m., shadows would be cast onto some houses along Park Hill Ave.

On December afternoons (4:00 p.m.) about 20 ft. of the corner residence on Buena Vista Ave. East at Park Hill Ave. (267 Buena Vista Ave. East) would be shaded by new construction. On spring and fall afternoons, about 50 ft. along the northern part of Park Hill Ave. and about 100 ft. just north of the bend in Park Hill Ave. would be shaded by the new construction. The southern and southwestern walls of the residence at 267 Buena Vista Ave. East and the western walls of the residences at 45, 47 and 49-51 Park Hill Ave. would also be shaded. Shadows would extend in the sideyards between these residences.

IV. Environmental Impacts

Shadow increases on spring, fall and winter afternoons would be minimal because most of the new shadows would coincide with the shadows cast by the existing hospital buildings and the topography of Buena Vista Park. Increased shadows attributable to the new construction would be the most pronounced on summer afternoons, when they would shade the project sidewalk (west side), most of the roadway of Park Hill Ave. and at the longest extension, about 15 ft. of the opposite sidewalk (east side) fronting residences.

NOTES - Visual Quality and Shadows

/1/ City and County of San Francisco, 1971, Comprehensive Plan, Urban Design Element, p. 57.

/2/ City and County of San Francisco, 1971, Comprehensive Plan, Urban Design Element, p. 56.

B. TRANSPORTATION, CIRCULATION AND PARKING

Except for the parking-demand discussion, information contained in this section is based primarily on the Park Hill Residential Transportation Study, October 1982. That study is incorporated by reference into this EIR and is available for public review at the Office of Environmental Review, 450 McAllister St., 5th Floor.

CONSTRUCTION TRAFFIC

Trucks hauling excavation materials and debris from the site or delivering building materials to it would increase traffic on local streets during the construction period. Construction workers driving to the site would also cause additional traffic in the site vicinity. The total estimated construction period would be 15 months./1/ An estimated average of six truck stops (12 trip ends) per day would be required during the estimated 15-month construction period. The peak period of construction truck trips would occur during the one-month period when 10,000 cubic yards of earth and 3,000 cubic yards of debris would be removed from the site. Access to the site for construction vehicles would primarily be from Buena Vista Ave. East.

Construction worker vehicle access to the site would be from Buena Vista Ave. East. The existing stairways and footpath entrance on Park Hill Ave. would be used for construction worker access and for dollying small equipment and materials onto the site. This could

IV. Environmental Impacts

result in some use of curbside space for construction vehicles on the west side of Park Hill Ave. which is now used by residents. The construction contractor indicates that use of Park Hill Ave. would be kept to a minimum./1/ All construction material and equipment would be stored on site, thus forestalling use of curbside parking space on the site frontages for storage purposes and precluding potential traffic hazards from impaired lines-of-sight. During this one-month period, a maximum of 35 truck trips (70 trip ends)/2/ per day would occur at the project site.

These trips would be especially noticeable to neighborhood residents, as there are now few truck trips in this residential neighborhood. Large trucks (particularly trucks hauling excavated materials and debris) could also affect lines-of-sight for other drivers at the intersection of Buena Vista Ave. East and Park Hill Ave. The project contractor and the Department of Public Works cannot specify haul truck routes at this time./1,3/ The Department and the contractor would make this determination close to the start of construction in order to consider traffic conditions occurring at the time of project construction. Factors considered in determining an appropriate route include concurrent construction activities along potential routes, streets known to be hazardous, street engineering specifications, intersection geometrics, and sensitive land uses. The contractor would meet with the Department of Public Works to determine a route that would minimize the impacts of construction truck traffic.

Construction workers would principally commute in their personal vehicles rather than make much use of public transit. During the months of peak construction activity there would be approximately 150 workers commuting to the site each day./4/ Assuming an average vehicle occupancy of 1.3 persons, and no transit use, there would be about 115 vehicles to be parked on streets in the area. These vehicles could not all be parked along or directly across from the site on Buena Vista Avenue East or on Park Hill Avenue, as there are now 97 such vehicle spaces and some are now in use by existing residents of the immediate site area. However, construction worker parking would occur in the day, when existing demand for curbside spaces is least. For those construction workers who would be unable to park along or across from the site frontage, other spaces now left vacant during the day by existing parkers along Roosevelt Way and elsewhere along Buena Vista Ave. East would accommodate these vehicles. Competition for spaces along these streets would be increased during the day due to the parking requirements of construction workers.

TRAFFIC AFTER FULL OCCUPANCY OF THE PROJECT

Vehicular Traffic

- The project would replace the present temporary use of the site by about 60 Children's Hospital employees, with a residential use of 200 units. The units would be expected to generate about 1,400 person trip ends/5/ per day, with about 140 person trip ends occurring during the p.m. peak hour between 4:00 and 6:00 p.m. (see Appendix E, p. 253)./6/ On the basis of U.S Census data for the tract in which the project site is located, 40% of the project residents would travel to and from the site on transit; 55% in automobiles, and 5% would use other non-auto modes of travel/7/. Assuming an automobile occupancy of 1.3 persons per vehicle, the project would generate about 600 vehicle trip ends/8/ per weekday, 10% of which, or 60 vehicle trip ends, would occur in the p.m. peak hour between 4:00 and 6:00 p.m./6/ On the assumption that fewer project residents would use transit for shopping, recreational and social trips, the percentage of transit ridership would be about 27.5%. This would result in approximately 95 peak-hour person trips in 75 automobiles.
- Both driveways to on-site parking would be from Buena Vista Ave. East, which would carry virtually all of the new trips. Some of the new vehicle trips would be oriented westward on the avenue, but most would be oriented toward the east, to major thoroughfares such as Haight, Fell-Oak and Castro Sts., and from those to the downtown or the Central Freeway. There are now about 200 vehicle trips on Buena Vista Ave. at Park Hill Ave. during the p.m. peak hour, 35 of which are by the Children's Hospital employees now working in the hospital building. The proposed 200 residential units would generate about 50 trips at this intersection during the p.m. peak hour for a net increase of 15 vehicle trips (50 minus the 35 existing trips) or about an 8% increase over the current 200 trips. Net increases on Park Hill Ave. attributable to the project would be also about 8%, resulting in a few new p.m. peak-hour vehicle trips added to the 30 trips now occurring there. This additional traffic would be expected to increase traffic hazards in the project vicinity roughly in proportion to the amount of new traffic generated. The project would generate about an 8% increase in peak-hour vehicles trips.

Because there are several eastward routes from the site, it is not possible reliably to predict traffic volumes from the project on each of these streets. These trips would be dispersed on various routes into and out of the neighborhood. The total increase of

IV. Environmental Impacts

vehicle trips on any one street would not be enough to cause a noticeable increase in any current delays for drivers at intersections in the project vicinity, or for drivers on Haight St., Castro St., 14th St., or Roosevelt Way. With the increases in traffic on Buena Vista Ave. East and on Park Hill Ave., volumes on those streets would remain light in relation to capacity./9/

- The late Donald Appleyard conducted a study of traffic capacity on neighborhood streets (Liveable Streets, Berkeley Press, 1981). That study found that traffic volumes of greater than 300-400 vehicles per hour had the effect of creating a barrier between two sides of a street, thus reducing neighborhood identity. Projected volumes on Buena Vista Ave. would not exceed 300 vehicles per hour at any time of the day, were the proposed project to be completed. (This analysis of volume does not take into account the functional capacity of a roadway.) It is not possible to predict volumes on other streets where project generated traffic would be dispersed.

Parking

On-Site Parking

As required by Section 151 of the City Planning Code, the project would provide one off-street parking space for each residential unit, for a total of 200 spaces. A 200-stall, self-park parking garage would be constructed under the proposed townhouse structures. A new 12.5 ft. wide driveway immediately adjacent to the former hospital building would allow vehicles to enter the site along the west side of the new townhouse structures. The driveway would lead to a one-way down ramp, with a 14 ft. width and 16% grade, which would descend into the first of three split levels of subsurface parking. The first level would contain 78 parking spaces; the second level, 78 parking spaces; and the third level, 44 parking spaces (see Figures 8-11, pp. 19-22). About half of the 200 parking stalls would be designed for compact cars and five would be for handicapped persons. Wall-to-wall separations (and hence aisle and maneuvering space) would be standard./9/ Ramps between pairs of subsurface levels would be two-way, 22.5 ft. wide with a 16% grade. A second driveway exit/entrance would be located westerly of, and closer to the intersection of Park Hill Ave. and Buena Vista Ave. East, at the location of the driveway presently serving the parking lot. Project construction would remove the curb cut at the existing driveway east of the hospital building; a curb cut would be added on Buena Vista Avenue East for the new driveway leading to the subsurface garage.

At this time, no separate off-street freight loading space has been designed. The provision of one off-street loading space would be required by Section 152 of the City Planning Code and is recommended by City Planning Commission Resolution No. 9286. Freight movement of household goods would peak as the residential units are initially occupied and would probably occur infrequently thereafter. The loading space requirement could be waived by the City Planning Commission as part of the PUD application (Section 304 of the City Planning Code). If waived, loading would occur either on Buena Vista Ave. East or on the interior driveway as no vehicle or pedestrian access is

- proposed from Park Hill Ave. Freight loading activities on Buena Vista Ave. East could cause traffic hazards if trucks double-park or impair lines-of-sight.

Parking Demand

Estimated weekday and weekend parking demands per dwelling unit at the proposed project are based on findings of a survey of parking demand at two residential complexes in San Francisco, Telegraph Landing and Diamond Heights Village,^{/10/} and on surveys at 56 apartment and condominium complexes in the greater Bay Area and Sacramento Valley.^{/11/} The survey of parking demand at Telegraph Landing and at Diamond Heights Village is discussed in Appendix E, Parking Demand Study, p. 260). As none of the 56 developments surveyed in the second study^{/11/} are located in San Francisco, the Wilbur Smith study was prepared to determine parking demand from projects within San Francisco as comparable as possible to the Park Hill Residential project. Results from the Wilbur Smith report should be considered more indicative of parking demand at the proposed project than those from the second study; however there is no objective basis for determining how much weight should be given to either study.

Available parking demand data for multi-family residential developments do not separate visitor demand from resident demand. In multi-family residential developments, the number of working adults per household (dwelling unit), the number of bedrooms per dwelling unit, and the availability of transit service are factors which affect parking demand. Available data sample a range of these factors.

Peak parking demand at the Park Hill Residential project would occur on weeknights when most project residents would be present and some visitor demand would occur. Weekend demand by residents of the project would not typically be as high because some of the residents would be away (but visitor demand would be greater than during the week). Thus, the overall peak weekend parking demand would be expected to be roughly comparable to the peak weeknight demand.

Peak Parking (Weekday/Weeknight)

The study data available, as described above, make it possible to estimate a range for both on-site and on-street parking demand at Park Hill. Peak parking demand, including that from both residents and visitors, at the Telegraph Landing and Diamond Heights

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Village developments was found to be about 1.0 space per unit. Peak (average) parking demand, including both residents and visitors, at the 56 apartment and condominium developments in the greater Bay Area and Sacramento Valley was calculated to be 1.36 spaces per unit. With these factors (1.0 and 1.36), the peak parking demand for the proposed Park Hill Residential development would range from 200 to 270 spaces, if all 200 units were occupied.

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The proposed Park Hill project would average fewer bedrooms per unit (1.12) than the surveyed complexes (1.27, 2.20, 1.65); see row 3 of Table 1, p. 58. The parking demand factors of 1.0 and 1.36 derived from the surveyed complexes may, therefore, overestimate actual parking demand of the proposed Park Hill project.

On the basis of this range (1.0 to 1.36), total peak parking demand of the Park Hill project would be 200 to about 270 spaces. Project residents would probably park in the 200 spaces provided on-site or in the 97 total curbside spaces on the Buena Vista Ave. East (66 spaces) and Park Hill Ave. (31 spaces) frontages of the site. This does not mean that all project residents would limit their parking to those spaces. Residents at the new construction may tend to seek parking on Park Hill when not using the garage. Because there would be no pedestrian access to the site from Park Hill Ave., parking on this street would not be as convenient as parking on Buena Vista Ave. East and probably not as convenient as in the garage.

Even if the total peak demand for parking were to be less than or equal to the 200 on-site spaces provided, parking at the project would not always be confined to the 200 on-site spaces. Visitors' cars, second cars of some units' occupants, and short-term parking by residents who have garage stalls would contribute to a demand for use of curbside spaces. This use of curbside parking cannot be precisely estimated. Demand for curbside spaces would be affected by the operation of the proposed garage. For example, if spaces in an on-site garage are restricted to resident use only, then all visitors would have to park on-street. Conversely, if none of the garage spaces were assigned or reserved (i.e. made available to both guests and residents), on-street parking would be expected to be less than if on-site spaces were restricted. Knowledge of where a stall is available may encourage a resident to use the garage even for a relatively short period of time. Design factors such as convenience of access to dwellings, space to maneuver around vehicles stopped in aisles, ease of spotting vacant stalls, etc. also determine how much a garage will be used. Attendant parking can make full use of a garage but can discourage its use if understaffing causes waits during peak activity.

Assignment of spaces to the control of the individual unit owners or tenants is common in condominium and apartment complexes; this discourages full use of on-site parking. If visitors were to be allowed to use on-site garage spaces, off-site project parking demand would be reduced. Security gates, which would prevent visitors from parking on-site, are not proposed at this time.

TABLE 1: PARKING DEMAND STUDY - PARK HILL RESIDENTIAL PROJECT

	Comparative Factors Affecting Parking Demand											
	Number of Units*	Number of Bedrooms*	Number of Bedrooms Per Unit*	Studios***	One Bedroom	Two Bedroom	Three Bedroom	Occupancy Rate (%)	Number of Parking Stalls	Parking Stalls Per Unit	Total Spaces Demanded (On- and Off-Site)	Peak Parking Demand Space Per Unit
Diamond Heights Village	396	504	1.27	135	153	108	---	100	396	1	392	0.99
Telegraph Landing	189+	374+	2.02	---	12	169	8	100+	189+	1	202	1.07
Sacramento Bay Area Projects 56**	171	269							---	---	20-175	1.36
Proposed Park Hill Project	200	223	1.12	9	166	25	0	100	200	1	198-272	.99-1.36

* Based on interviews with managers of subject properties conducted by Wilbur Smith and Associates on November 19 and December 3, 1982.

** Comparative factors are based on average of units and bedrooms provided in the 56 residential projects.

*** Studios are counted as one bedroom.

+ There are five (5) commercial spaces, which residents cannot use.

SOURCE: Wilbur Smith and Associates; TJKM Transportation Consultants; and Environmental Science Associates.

Parking demand comprises both on-site demand and on-street demand. On-street peak parking demand at Telegraph Landing and Diamond Heights Village was calculated to be between 0.2 and 0.4 spaces per unit (see Appendix E, Parking Demand Study, p. 260 and Table E-3, p. 265). With these factors, the proposed Park Hill project would generate peak on-street parking demand of between 40 and 80 spaces. The survey of the 56 developments did not specifically address curbside parking factors.

The demand for curbside parking could be met by full use of existing curbside parking on Buena Vista Ave. East and on Park Hill Ave. by the project's motorists. That is, the proposed on-site parking spaces, in conjunction with the typical number of existing observed vacant curbside spaces on the Buena Vista Ave. East and Park Hill Ave. project frontages would be sufficient in number to meet the estimated peak demand. As stated above, however, it is not possible to predict the variables of human behavior which would determine how often curbside parking would be sought rather than garage parking. There could be competition for spaces on Park Hill Ave., and existing residents of Park Hill Ave. might not always be able to park directly in front of or directly across the street from their homes. Competition for parking beyond the site frontage would change little as a result of the project. If residents are unable to park near their homes at night the opportunity for incidents of crimes against residents walking to their homes would increase.

Parking (Weekend)

Weekend parking demand for visitor spaces, particularly on holiday or summer weekends, could exceed the available supply of on-street parking immediately surrounding the project site. If the project generated the peak estimated curbside demand of 80 spaces, this demand could cause competition for parking space beyond the frontage immediately surrounding the site and onto other blocks in the neighborhood. If parking along residential frontages within one-block of the site were 90% occupied, as was indicated by the survey conducted on Sunday, August 15, 1982, competition for parking beyond the site frontage could occur. If parking occupancy were at 75%, as indicated on Sunday, September 26, 1982 no further competition would be expected to occur (see Appendix E, pp. 253-255 and Figure E-3, p. 258 in Appendix E).

TRANSIT

Transit use by project would be about 560 person trip ends per day with about 60 occurring in the p.m. peak hour.^{7/} This would mean 60 persons per hour (40% of the estimated 140 peak-hour person trip ends) riding Muni to and from the site during the peak morning

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and afternoon commute hours. If all were to use the 37 Corbett line this would represent about 15 additional patrons per bus during the peak hour commute; in the p.m. rush, most of these would transfer to the 37 Corbett line from connecting lines. The 37 Corbett runs every 15 minutes during peak hours. Each bus has a maximum recommended capacity of 75 persons. The line now operates with a ridership of about 60% of capacity./12/ The addition of 60 persons on the 37 Corbett line during peak hours could increase ridership by an amount equal to 20% of capacity, half of the unused capacity.

The 37 Corbett bus travels westbound on Buena Vista Ave. East. In the westbound lane, the buses are not likely to encounter interference from vehicles entering and leaving the site as driveways are on the south side of the street.

EMERGENCY VEHICLE ACCESS

The interior driveway can pose an access problem for fire-fighting equipment. Access to the interior of the site would be especially important for the new townhouse and parking structures as there would be no other direct vehicle access to units fronting the interior courtyard. The roadway geometrics of the driveway have not yet been designed; however the interior of the site could accommodate a turnaround space for firefighting equipment. The San Francisco Fire Department would review and approve project site plans as part of the building permit application; if changes to the interior driveway are necessary, the project sponsor would then be required to make them before approval of the building permit.

CUMULATIVE TRANSPORTATION, CIRCULATION AND PARKING IMPACTS

- The preceding impact analyses assumed that the 18 parking spaces in front of the St. Joseph's College of Nursing building would not be used by residents of the project or by residents of the area. On November 4, 1982, the City Planning Commission approved a project that would remodel the College of Nursing building into a 60-unit bed and care facility (catering to people who need special short-term care after having been released from hospitals) with 11,800 gross (9,800 net) sq. ft. of ancillary medical office space. No on-site parking is proposed for the bed and care project; there are 18 perpendicular parking spaces immediately in front of the former College of Nursing building. It is anticipated that during the day most of the existing 18 curbside spaces would be used by employees of this building (11 full-time and seven part-time) and visitors.

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- Should parking demand for the bed and care facility exceed the demand for 18 spaces or displace existing parking currently used by neighborhood residents (1-11 spaces) along the college frontage, then parking demand from the facility would spill over into parking spaces along the site frontage and into the nearby neighborhood. (The range of existing parking in front of the college of nursing is based on Figures E-1, E-2, and E-3, on pp. 256-258 and on Appendix B of the Community Response Document, April 28, 1983, prepared by the Buena Vista Neighborhood Association.) The peak demand for parking spaces associated with the proposed bed and care facility would occur during the day, and would not coincide with the peak overnight parking demand of existing neighborhood residents and residents of the proposed Park Hill residential project. Visitor parking could occur during the peak weeknight and weekend periods.

Two blocks north of the site is a new 18-unit condominium development at One Baker St.

- These units were acquired by a group of investors in May 1983, and are expected to be placed on the market as rental units in July 1983./13/ At full occupancy, this development would generate a total of seven p.m. peak hour vehicle trips.

The bed and care facility, the One Baker St. condominiums, and the proposed project would generate about 80 to 90 vehicle trips ends during the p.m. peak hour. This cumulative effect would not be noticeably greater than the effect of the proposed project alone (60 p.m. peak-hour vehicle trips).

● NOTES - Transportation, Circulation and Parking

/1/ Hans Groffie, Williams & Burrows Inc., General Contractors, letter, August 19, 1982 and telephone conversation, March 1, 1983..

/2/ A trip end is the origin or destination of a person-trip. Each person trip has two ends.

/3/ Harvey Kwan, Engineer, Department of Public Works, Bureau of Engineering, Division of Traffic, telephone communication, March 16, 1983.

/4/ Assumes that two-thirds of the construction work would be completed in 10 months.

/5/ Person trip end refers to a trip end made by one person by any mode of travel (i.e. transit, walking, auto and bicycle). See also the definition of trip end in note /2/, above.

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/6/ Person trip generation estimates are based on a 1980 study by Caltrans of the Lake Merced Hills condominiums on Lake Merced Boulevard in San Francisco. (California State Department of Transportation, Thirteenth Progress Report on Trip Ends Generation Research Counts, June, 1981, Caltrans.) The results of the Lake Merced study were similar to those of other such studies of condominium and rental apartments elsewhere in the Bay Area. There were 5.7 weekday vehicle trips per unit, 10% of which occurred during the peak hour. Average vehicle occupancy was 1.3 persons per vehicle. This study is on file and available for public review at the Office of Environmental Review, 450 McAllister St., 5th floor.

/7/ 1970 U.S. Census, and Gail Bloom, Transportation Planner, Department of City Planning, telephone conversation, March 4, 1983. The 1980 Census data for travel modes by census tract are not yet available. The 1970 Census reports that 34% of the residents used public transit for journey-to-work trips in Tract 170, the tract in which the project site is located. The estimated 40% transit ridership is based on present availability of the Muni Metro service which began operation subsequent to the 1970 Census.

/8/ A vehicle trip end is the origin or destination of a vehicle trip. Each vehicle trip has two ends.

/9/ Institute of Transportation Engineers 1982, Transportation and Traffic Engineering Handbook.

NOTE: In the Draft EIR, page 62 was a duplicate of the text on p. 61; p. 62 has been deleted from the Final EIR and the text continues on p. 63.

IV. Environmental Impacts

/10/ "Parking Demand Study, Park Hill Residential Project", Wilbur Smith and Associates, December 22, 1982. "Diamond Heights Village", near Twin Peaks, and "Telegraph Landing", northwest of Telegraph Hill, were surveyed. The Wilbur Smith Study is on file and available for public review at the office of Environmental Review, 450 McAllister St., 5th Floor.

/11/ A compilation of studies during 1978-82 of parking demand at 56 condominium complexes was made by TJKM, Transportation Consultants. This study is on file and available for review at the Office of Environmental Review, 450 McAllister St., 5th floor.

/12/ From rider check data compiled by the Muni Planning Department, taken of outbound buses at Market and Castro Streets (1981).

Don Gerring, Rental Agent, One Baker St., telephone conversations, May 19, 1983 and June 3, 1983.

- /13/ Don Gerring, Rental Agent, One Baker St., telephone conversation, May 14, 1983 and June 3, 1983.

C. PARK AND RECREATION FACILITIES

The project would increase the population of the Buena Vista neighborhood and the City by about 300-350 persons (based on an expected average household size of 1.5 to 1.75 persons). This added population in the Buena Vista neighborhood would raise demand for recreation facilities and open space in the area. Recreation facilities proposed as part of the project include a sundeck on top of the hospital building and an exercise room.

There are no publicly available data concerning demand for recreation space by San Francisco residents./1/ National standards indicate that the project would raise demand for neighborhood park space by about 3/4 of an acre./2/ With project demand partially served by the recreational facilities to be included as a part of the project, nearby parks would be expected to accommodate the increased demand by project residents for open space and recreation activities such as hiking and sunning.

To the extent that project residents visiting the park do not use designated pathways, they could accelerate hillside erosion in the park. The Friends of Buena Vista Park are concerned that increased use of Buena Vista Park by Park Hill residents and others would aggravate existing erosion problems, necessitate additional trail repair and improvements, and increase the use of undesignated pathways./3/

The project would create an additional demand for recreational facilities, such as tennis courts, located in the vicinity of the project. National averages indicate that 25%,

or about 70-80, of the project residents would play tennis on a regular basis (once per week for one hour). Recreational planning standards predict that a population of about 2,000 people would generate a demand for one standard tennis court./5/

The effect of this increased demand on tennis courts in the area would result in a longer waiting time for tennis players now using the courts, particularly at the two courts in Buena Vista Park. The increased demand by tennis players who would reside at Park Hill cannot be correlated quantitatively to how much longer existing players would be required to wait for available courts because there is no way to predict reliably when these new residents would play tennis or even if they would use the public courts in the vicinity of the project site.

NOTES - Park and Recreation Facilities

/1/ Debra Learner, Planner, San Francisco Recreation and Park Department, telephone conversation, November 29, 1982.

/2/ National Recreation and Park Association, Park Standards by Type and Population Served; 2.5 acres of neighborhood park space required for every 1000 residents, $2.5/1000 = 0.0025$ acres/person X 300 to 350 = 0.75 to 0.88 acres.

/3/ John Hooper, Friends of Buena Vista Park, telephone conversation, February 9, 1983.

/4/ Statistical Abstracts, United States Department of Commerce, 1981, Bureau of the Census.

/5/ National Recreation and Park Association, Illustrative Recreational Planning Standards, in Rau, J. G. and D. C. Wooten (Eds.), 1980, Environmental Impact Analysis Handbook.

D. ENERGY

Construction Energy Requirements

About 5 billion at-source Btu (about 33,000 gallons) of fuel (gasoline and diesel fuel) would be used on the site during construction./1/ Onsite energy use would be a small portion of total energy use, which would include energy generated at-source but lost in transit to the site of use, energy embodied in the manufacture of building materials and energy for worker transportation.

Operational Energy Requirements

Proposed Energy Design

The project would be designed to comply with the prescriptive building energy efficiency standards of Title 24 of the California Administrative Code, which specify the degree of insulation, weatherstripping, glazing, lighting, and other features required for new buildings./2/ Electricity would be used for lighting, heating, ventilation, cooking, elevator operation, appliance operation, water heating, and plumbing system pumping. The project would make no use of solar energy. No air conditioning system is proposed.

The primary use of electricity would be for space and water heating. Inefficient energy consumption could also result from loss of heated air from the building or intrusion of outside air into the building through doors and other openings.

The lighting system would be a large consumer of energy in the project. Illumination of interior spaces would be provided primarily by lights at an average of about 0.39 watts per sq. ft. The main hospital building would be suitable for daylighting because it is long and narrow and is oriented north to south, thereby allowing exterior light to penetrate into the building interior. Excessive solar gain of the east- and west-facing walls of the hospital building would be minimized because the concrete floors and heavy exterior wall construction of this building would stabilize interior temperatures and would not transmit heat readily.

The locations and orientations of the existing buildings and the new construction would affect the amount of heating required for the project. The existing project structures are arranged on the north, west, and south portions of the site. The approximately north-south orientation of the main hospital building, combined with its relatively narrow width, will permit very little heat gain from passive heating of south-facing walls. The north-south orientation of the new construction would also limit passive solar heat gain in the townhouse structures. In addition, shadows from existing structures and existing non-deciduous trees would severely limit the solar day during the winter, when passive solar heating has the greatest potential to offset mechanical heating needs. The existing convent and chapel buildings have larger south-facing wall areas than the hospital and would receive proportionately more solar heat gain during the winter.

Proposed Energy Budget

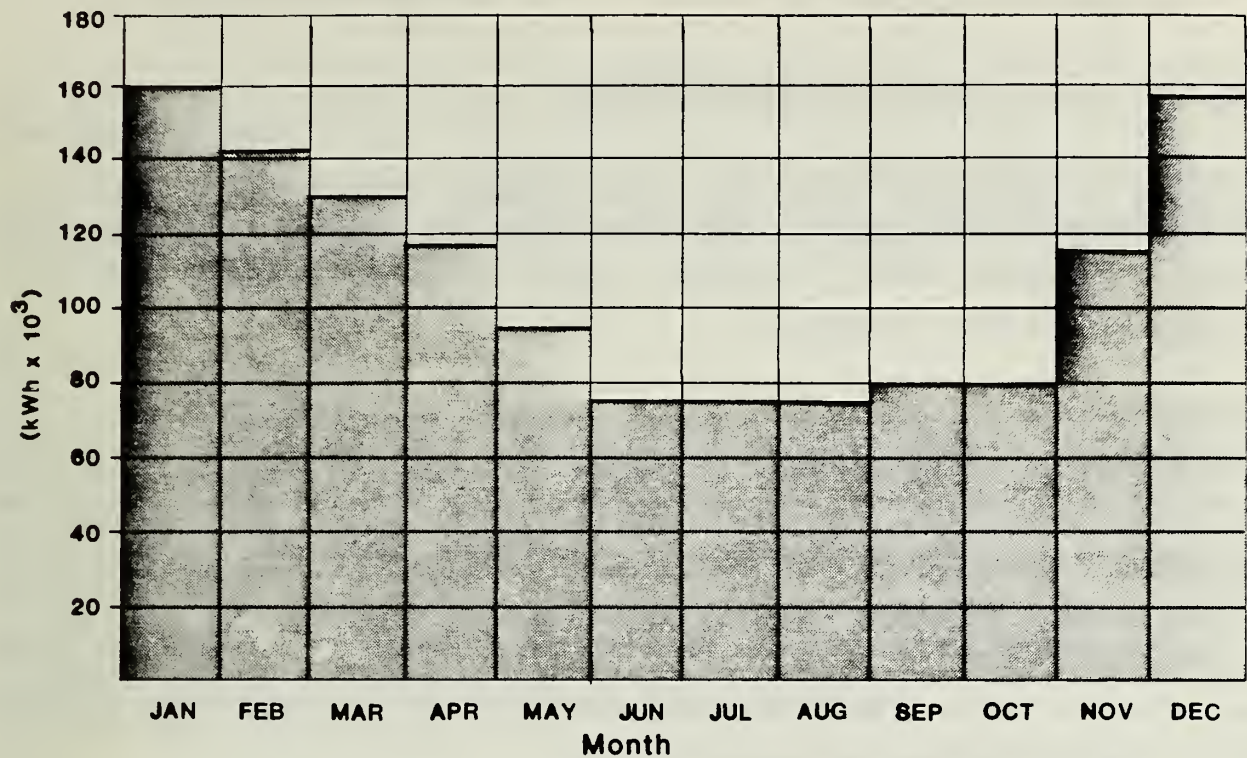
No natural gas use is currently proposed for the project./3/ The project operation would require about 1.3 million kWh of electricity annually and no (zero) natural gas. This would equal about 13.3 billion Btu at source (or 83,000 Btu per sq. ft.). Electrical consumption would rise from about 75,000 kWh per month during the summer to about 160,000 kWh per month during the winter. Heating with electricity is less efficient than with natural gas. The above figures do not include energy use for exercise facilities such as a swimming pool, jacuzzis, hot tubs, and/or saunas.

Electricity consumption in the winter would peak between 5:00 and 8:00 a.m. and again between about 6:00 and 9:00 p.m. Peak electrical consumption would be about 400 kWh or 25 Btu per sq. ft. per hour. This would be about three times the average electrical load during the day, which would occur on winter mornings. These peak periods would not coincide with PGandE's systemwide peak period, which occurs between noon and 6 p.m. on summer afternoons. The buildings' peak demand of about 400 kW would be equal to about 0.002% of PGandE's systemwide peak electrical demand. Estimated peak day demand and average annual electricity consumption curves for the project are shown in Figure 22, p. 66.

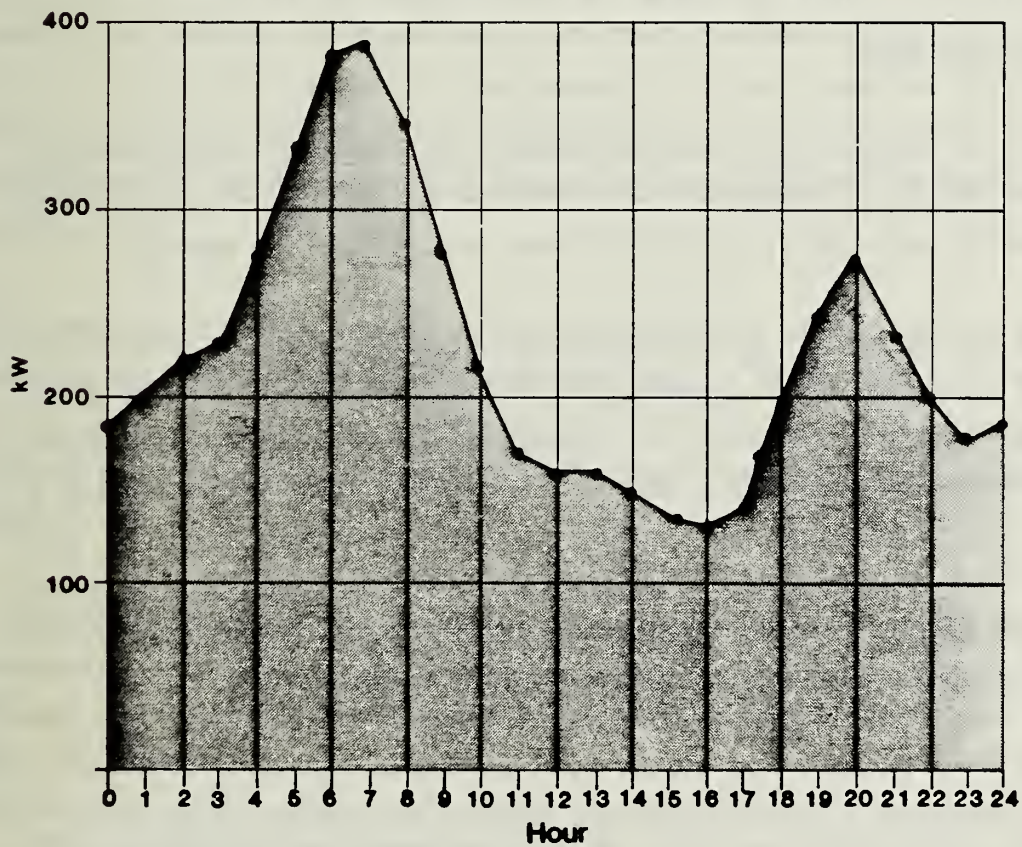
The total annual energy budget of the project, including both new construction and existing structures to be renovated, would be about 15 billion Btu, or 450 billion Btu over the 30-year life of the project. This would be an increase of about 350% in annual energy use on the site.

Transportation Energy

Project-related transportation would cause additional, offsite energy consumption. For the project trip generation described in Section IV. B., project-related trips would require about 136,000 gallons of gasoline and diesel fuel annually. The total annual transportation demand, converted by at-source factors to a common unit, would be about 19 billion Btu. This projected use is based upon the mix of road vehicles expected in California in 1985. Generally, statewide average fuel use per mile is expected to decline until 1985 as the vehicle fleet becomes more efficient.



ANNUAL ELECTRICITY CONSUMPTION BY MONTH (kWh x 10³)



PEAK DAY (January)

FIGURE 22: Projected Electrical Load Distribution

SOURCE: Environmental Science Associates, Inc.

Energy Conservation Regulations, Plans, and Policies

An energy audit would be conducted prior to construction as required by the Residential Energy Conservation Ordinance (No. 7282). The project design would be modified as necessary to implement Title 24 standards. Compliance to the standards would be verified by a Certificate of Compliance.

As an infill development, the project would be consistent with City energy policies to establish land use patterns that reduce the number and distance of transit and vehicle trips. The project would also be consistent with City energy policy to discourage use of master metering. Where interior wall modifications are proposed in the existing buildings, the project would be consistent with City policies to insulate existing housing; all new construction would meet Title 24 insulation requirements. The project would not address policies to increase the use of renewable and alternative energy systems (see Appendix F, p. 267, for a discussion of applicable energy policies).

Cumulative Energy Consumption

Energy requirements for approved and recently proposed development in San Francisco would increase annual electricity consumption by more than 300 million kWh, which would be about 13% of PGandE's projected systemwide increase over the next ten years./4/

Cumulative demand for electricity by approved and recently proposed projects in San Francisco would increase electrical demand in the PGandE service area by about 0.4%. PGandE's reserve margin, the amount of excess capacity over demand that serves as a safety allowance, is estimated at about 14% for 1982. This reserve margin is projected to rise to about 25% as the Diablo Canyon nuclear power plant comes on line, then decline slowly during the late 1980's to about 18% in 1990. The additional electrical demand created by the project and other projects approved or under consideration by the City could be accommodated by existing and planned PGandE facilities.

NOTES - Energy

/1/ Hannon, B. et al., 1978, "Energy and Labor in the Construction Sector," Science 202: 837-847.

/2/ Prescriptive standards consist of required design features that ensure a minimum level of energy efficiency.

IV. Environmental Impacts

/3/ Kaplan/McLaughlin/Diaz, Leon Sugarman, Architect, telephone communication December 15, 1982.

/4/ Pacific Gas and Electric Company, 1982, Forecast of the Demand for Electricity Within the Pacific Gas and Electric Company Service Area, 1982 - 2002; Electricity Technical Supplement.

E. GROWTH INDUCTION

The Park Hill Residential project would provide a total of 200 new housing units; 153 of these units would be in rehabilitated St. Joseph's Hospital buildings and 47 units would be in new buildings. This project would increase the residential population on the site by 300 to 350 people (based on an expected average household size of 1.5 to 1.75), as the site is currently not used for residences. This increased population would increase demand for retail and recreational facilities in the Buena Vista neighborhood.

The project would provide about 160 person-years of employment during the 15-month construction period and generate up to five permanent jobs for management and maintenance of the residential development. No jobs would be eliminated by project implementation; employees of Children's Hospital who currently work at the site would be transferred to existing offices in the vicinity of Children's Hospital, located at 3700 California St.

This development would require a zoning reclassification to RM-2 from the existing RH-2 district. An RM-2, combined with authorization of a PUD, could allow development of up to 274 units, 74 units more than the proposed project. For comparison, the existing RH-2 district could allow development of 74-88 units without a PUD and up to 109 units with a PUD.

The overall effect of the proposed zoning reclassification would be to increase the residential unit density on the project site and in the area. The area within approximately 300-ft. of the project site is zoned RH-2, RH-3 and RM-1 (see Figure 11, p. 22). These districts are not developed to the maximum density permitted by the City Planning Code. Within this 300-ft. radius, the average existing unit density within the RH-2 district is 28 units per acre; within the RH-3 district, 36 units per acre; and within the RM-1 district, 74 units per acre./1/ For comparison, the project would develop 80 units per acre. The unit density of the project would be 285% of the density permitted by the existing RH-2 district (within a 300-ft. radius); 222% of the density permitted by the RH-3 district, and about 108% of the permitted RM-1 district density.

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- Since 1973, residents of the Buena Vista neighborhood had sought to downzone the project site, the College of Nursing site, and several nearby vacant parcels owned by St. Joseph's Hospital (Lots 15, 16, 17, and 18) from R-4. In 1978, as a result of a citywide residential zoning study, the City Planning Commission reclassified these parcels to RH-2./2/

- The project probably would not encourage new residential construction on existing lots under existing zoning because nearby potential development sites are limited and there is minimal incentive to replace existing structures with higher density structures on lots which are not developed to the maximum density permitted. However, if rezoning of the project site were to occur, this could encourage rezoning of nearby areas to higher densities, and additional residential development could occur.

The project could also set a precedent for reclassifying the College of Nursing and several adjacent vacant lots which are owned by St. Joseph's Hospital to a higher density than the existing RH-2 district (see Figure 1, p. 10). The project could encourage rezoning of these parcels to the RM-2 district because the higher density district of the project site could be extended to these adjacent parcels without resulting in spot zoning. If the former School of Nursing site were rezoned to RM-2, it would contain 42 dwelling units without Conditional Use authorization, or 62 units with a Conditional Use authorization for a PUD. If the adjacent vacant parcels owned by St. Joseph's Hospital were rezoned to RM-2, then lots could contain 26 dwelling units without a Conditional Use authorization, and 40 dwelling units with a Conditional Use authorization for a PUD.

The current residences of the occupants of the proposed project are not now known. It is expected that a portion of the proposed units would be sold to existing San Francisco residents and homeowners. Current San Francisco residents who would purchase units in the proposed project would vacate existing housing, a portion of which would be purchased or rented by nonresidents. The project would consequently serve existing resident population as well as new residents to the City.

The Park Hill Residential project would not require the expansion or extension (from main terminals or substations) of utility lines to serve the site. The types and locations of existing gas and electricity feeder lines currently serving the site would need to be altered, but this would not require an expansion of capacity.

● HOUSING

Several policies of the Residence Element pertain to the proposed project (April, 1983). These include:

"Objective 1, Policy 4: Encourage infill housing on appropriate sites in established neighborhoods."

"Objective 2, Policy 1; Set allowable densities in established residential areas at levels which will maintain neighborhood scale and character."

Other relevant policies are Objective 5, Policy 3, which discusses inclusion of low and moderate income units in new housing development and Objective 7, Policy 2 and Policy 3 which encourage access for disabled residents and the availability of housing for groups with special housing needs.

Other applicable policies include:

"Objective 6, Policy 4: Promote development of well designed housing." This policy refers to the scale, design character, and set backs of new housing.

"Objective 7, Policy 4: Eliminate discrimination against households with children.

"Objective 7, Policy 5: Encourage economic integration in housing.

"Objective 7, Policy 6: Provide adequate rental housing opportunities."

The project would not be responsive to Objective 7 as it would not provide rental units. Several units in the hospital building could be entered from street level with elevator access to upper floors. This would allow the opportunity for access to the project by disabled persons. No low or moderate income units are currently proposed, therefore the project would not address Objective 5. The project would include 25 two-bedroom units which would provide an opportunity for people with children to live at the site (see also Alternative C for a discussion of a project alternative that could provide units for elderly residents).

The proposed project would result in more intense residential population and level of development than exists in the adjacent neighborhood. The scale and density of the project cannot be strictly compared to the adjacent neighborhood, as the project would convert the existing hospital buildings, which already have a more intense scale, into residential units.

IV. Environmental Impacts

- The majority of homes in the Buena Vista neighborhood have an average size of between 1,600 and 2,500 sq. ft.; the project would have an average unit size of 750 sq. ft. According to some real estate theories, unit size is one factor that can influence land values when there are dissimilar residential uses in a neighborhood. This effect on land values in the Buena Vista neighborhood cannot be determined.

NOTES - Growth Induction

/1/ Unit density information is based on the Street Address and Ownership files and Parcel/Lot Books available at the San Francisco Assessor's Office. Units per acre are the existing units per net acre of residential land within each zoning district; roadways, sidewalks and vacant lots are excluded from the land area computation. The number of bedrooms per unit is another indicator of probable population density. However, there are no publicly available Census or Assessor's data which specify numbers of bedrooms per unit.

- /2/ Feasibility Study: St. Joseph's Hospital Site, November 24, 1980, prepared by John M. Sanger Associates notes that:

"The site was rezoned (from R-4 to RH-2) during the comprehensive residential rezoning of the city, in which most areas of the city were rezoned to correspond with the existing scale and density of development (p. 14, second paragraph). It is likely that the site was rezoned RH-2 in order to ensure substantial review prior to conversion to any other use and in order to ensure conditional use authorization for any change in institutional use (p. 18)."

F. CUMULATIVE EFFECTS

Table 2a lists five proposed projects in the Haight Ashbury area which are likely to be in operation at or shortly after completion of the Park Hill Residential project, and have environmental effects which could compound with those of the Park Hill Residential Project. These potential environmental effects are addressed by category below.

TRANSPORTATION EFFECTS

The proposed UCSF additions and Mercy Terrace housing development could generate peak-hour vehicle and transit trips, as shown in Table 2b, p. 199. The UCSF co-generation power plant and wind turbine generators would likely generate fewer than 10 peak-hour person trips, which would have a negligible effect on peak-hour traffic conditions. Estimated peak-hour vehicle and transit trips generated by the Park Hill Residential project are shown for comparison.

TABLE 2a: PROPOSED PROJECTS IN THE GREATER HAIGHT ASHBURY WHICH COULD HAVE CUMULATIVE EFFECTS WITH THE PARK HILL PROJECT

<u>Project Sponsor</u>	<u>Proposed Use</u>	<u>Floor Area (gross square feet) or Units</u>
University of California, San Francisco	1) Library	140,000 - 160,000
	2) Research Buildings	90,000
Mercy Services Corporation (Mercy Terrace, Fell St. between Baker and Lyon Sts.)	3) Housing for the Elderly	158 units
University of San Francisco	4) Co-generation Power Plant	unknown
	5) 5 Wind Turbine Generators	—

SOURCE: San Francisco Department of City Planning

The estimates shown in Table 2b are worst-case as they assume that all trips would be new trips arriving or departing from the proposed use. It is likely, for example, that many of the trips to the UCSF Library Addition would not be new trips. They would, instead, be multi-purpose internal trips within the University, which are part of already existing vehicle trips to attend classes. Because the elderly generally make fewer peak-hour trips than do other age groups, the number of trips shown for the Mercy Terrace housing is also likely to be an overestimate.

Major routes through the Haight Ashbury area which would carry major portions of peak-hour vehicle trips generated by all of the projects in Table 2b are Fell St., Oak St. and Haight St. Of the total 465 new peak-hour vehicle trips shown in Table F-2, about 200 would occur on Oak, Fell and Haight Sts., combined. The remaining trips would be distributed on minor streets oriented to the north, west and south of the area. Since Oak, Fell and Haight Sts. currently carry about 2,500, 2,800, and 540 vehicle trips, respectively, during the peak hour/1/, new vehicle trips from the Park Hill project and cumulative development would represent about a 0.3% addition to peak-hour volumes on any of these streets. If about 150 vehicle trips per hour were added to each lane of one approach at a typical signalized intersection on Oak, Fell, or Haight Sts., an additional 10% of capacity would be used. Because about 200 new peak-hour trips would be

TABLE 2b: ESTIMATED PEAK-HOUR TRIP-ENDS* GENERATED BY CUMULATIVE PROJECTS

<u>Proposed Project</u>	<u>Vehicle Trip-Ends**</u>	<u>Person Trip-Ends on Muni**</u>
UCSF Library Addition	300	300
UCSF Research Buildings	65	65
Mercy Terrace	45	45
Park Hill Residential (net new trips)	55	25
	<hr/>	<hr/>
TOTALS	465	435

* A trip-end is one destination of a round trip.

** Based on trip generation factors contained in Caltran's Trip End Generation Research Counts, Vol. 10, and ITE, Trip Generation, 1975. Transit use was assumed to represent 40% of peak-hour travel, and autos were assumed to account for 55% with an average occupancy of 1.4%.

SOURCE: Environmental Science Associates, Inc.

distributed among the three lanes of Oak Street, three lanes of Fell Street and two lanes of Haight Street, the resulting increase in capacity in use at intersections on these streets would be less than 10%.

Muni lines available to the project and cumulative development are shown in Table 2c, p. 200. Lines which would serve all the projects listed, and which thus would experience the greatest cumulative impact, are the 6 Parnassus and the 66L Quintara Limited. Because the peak-hour Muni trips shown in Table 2c would be distributed among four lines for the UCSF projects, among eight lines for Mercy Terrace and among five lines for the Park Hill Residential project, and because each line runs four to ten buses (LRV's for the N Judah) per hour, cumulative development could add roughly 10 to 25 riders to each bus on the 6 and 66L lines during the peak hour. Both Mercy Terrace and the Park Hill Residential project are served by two lines in addition to the 6 Parnassus and the 66L Quintara Limited: the 7 Haight and the 71 Noriega. The 7 Haight and the 71 Noriega could experience about one to five additional passengers on each bus during the peak hour due to these two projects. Project impacts on the 37 Corbett line, discussed on pp. 59-60 of the Draft EIR, would be unlikely to be increased by proposed cumulative development.

PARKING

As UCSF is over 6,000 feet from the Park Hill Residential project, it is unlikely that there would be any cumulative parking effects attributable to these two projects. Generally, people park within walking distance (roughly 1,000 - 1,500 feet) of their destinations.

TABLE 2c: MUNI LINES SERVING CUMULATIVE PROJECTS

<u>Proposed Project</u>	<u>Muni Lines Within 3 Blocks</u>
UCSF Library Addition and Research Building	N, <u>6</u> , 43, <u>66L</u> *
Mercy Terrace	5, <u>6</u> , <u>7</u> , 16X, 21, <u>66L</u> , <u>71</u> , 72X
Park Hill Residential	<u>6</u> , <u>7</u> , 37, <u>66L</u> , <u>71</u>

* Bus lines underlined in the table are those which would have a cumulative effect with the Park Hill project.

SOURCE: San Francisco Municipal Railway and Environmental Science Associates, Inc.

It is not likely, therefore, that the Park Hill Residential project would contribute to parking demand near UCSF, nor that UCSF would exacerbate the project's effects in the Park Hill neighborhood. Mercy Terrace is about 1,600 feet away from the Park Hill Residential project. At this distance, it is unlikely that parking at the two projects would overlap, particularly because the residents at Mercy Terrace would be elderly, and the perceived distance between the two projects would be made greater by the Panhandle and the topography of Buena Vista Hill. Shoppers from these two residential projects could together contribute incrementally to increased parking demand near the Haight St. commercial district.

AIR QUALITY

Haight, Oak and Fell Sts. experience good air quality, as does almost all of San Francisco west of the downtown, because of the prevailing winds from the ocean. Existing carbon monoxide concentrations along Oak and Fell Streets are about 11 parts per million (ppm) for the peak one-hour period (morning "peak hour" for Oak St.; evening "peak hour" for Fell St.) and 6 ppm for the peak eight-hour period during stagnant air mass conditions./2/ Haight St. experiences slightly lower worst-case concentrations: about 8 ppm during the evening peak hour and 5 ppm over the peak eight-hour period./2/

Traffic from the projects shown in Table 2b would increase existing one-hour and eight-hour carbon monoxide concentrations along all three arteries by less than 0.5 ppm, an amount well within estimated daily fluctuations in concentrations of 3-4 ppm. Worst-case (poor dispersion) concentrations along Oak and Fell Sts. would remain at about 50% - 55% of the state one-hour standard of 20 ppm, and about 65% of the state eight-hour standard of 9 ppm./2/

NOISE

Existing 24-hour noise levels (Ldn) are about 70 decibels (dBA) along Haight Street, and about 75 dBA along Oak and Fell Sts./3/ These noise levels are loud enough to cause one to raise one's voice to be heard three feet away, and are considered very annoying (particularly bus accelerations along Haight St.). Traffic from the four proposed projects and the Park Hill project would not increase existing noise levels as noise from these projects would be masked by the existing noise levels.

GROWTH INDUCTION

The projects listed in Table 2a, together with the Park Hill Residential project, could affect land values and residential and commercial rents in the greater Haight Ashbury./4/ The extent of these effects cannot reliably be quantified. See also Section IV.E. Growth Induction, pp. 68-69b.

All of the projects listed in Table 2a would have local environmental effects, such as shading, parking, visual and land use effects, which would not accumulate with those of the Park Hill Residential project, and which would more appropriately be addressed in project-specific EIRs for those projects.

IV. Environmental Impacts

NOTES - Cumulative Effects

/1/ Based on a series of 24-hour counts taken in 1977 and 1980 by the City and County of San Francisco, Department of Public Works, Traffic Engineering Division. The peak hour on Oak St. is in the morning; on Fell and Haight Streets, in the evening.

/2/ Calculations based on Bay Area Air Quality Management District, 1975, Guidelines for Air Quality Impact Analysis of Projects and California Air Resources Board, 1981, "EMFAC-6C Emission Factors."

/3/ City and County of San Francisco, Department of City Planning, September, 1974, Environmental Protection Element of the Comprehensive Plan.

/4/ Construction of a power plant and wind turbine generators at USF's campus could decrease property values in the immediate vicinity of the campus, as this could be conceived as an incompatible use, depending on the design and potential operating nuisances.

V. MITIGATION MEASURES

In the course of project planning and design, measures have been identified that would reduce or eliminate potential environmental impacts of the proposed project. Some of these measures have been or would be adopted by the project sponsor, architects or contractors; some may be implemented by public agencies, and the remainder are not included in the project or are under consideration. The City Planning Commission could require that some or all of these measures be included as conditions of project approval, if found to be warranted. Each mitigation measure and its status are discussed below. Where a measure has not been included in the project, the reasons for this are discussed.

A. VISUAL QUALITY AND SHADOWS

MEASURES PROPOSED AS PART OF THE PROJECT

- The new townhouse structures would be designed to complement the Spanish Renaissance Revival architecture, thus avoiding sharp contrasts with the architectural style of the former hospital buildings which is familiar to viewers of the existing site. The color of the new buildings would be light, the windows small-scaled and rectangular, and the roofs hipped and tiled.
- The proposed new construction would be set back from the property line to preserve much of the existing landscaping along Park Hill Ave.
- Additional landscaping would be planted along Park Hill Ave. to further buffer views of the new development from the surrounding neighborhood and to moderate the institutional look of the existing grounds of the former hospital complex.
- The main stairway and footpath entrance located next to the new townhouse construction would be eliminated on Park Hill Ave. to provide security and privacy to existing neighborhood residents and to discourage parking on Park Hill Ave. by residents of the project.

V. Mitigation Measures

- - All feasible care would be taken to preserve the root structure of remaining trees during trench digging. In particular, the large pine and palm along Park Hill Ave. would be considered when plants and watering regimes are planned.

● MEASURES NOT INCLUDED AS PART OF THE PROJECT

- The new construction could be designed so that the two- to four-story buildings were stepped down in a northerly direction from the convent, instead of stepping down from the hospital building as proposed. This form of stepping would provide a transition in height and scale from the convent building. The project sponsor and architect have rejected this measure because they believe the proposed design would have fewer visual impacts on Park Hill Ave. near the convent building. The proposed design would step the townhouses down in a southerly direction so that most of the lower two- and three-story units would be opposite the majority of the homes on Park Hill Ave.
- A complete, professional photographic record could be made of the chapel interior and donated to a local archive (e.g. San Francisco Archives at the Public Library, California Historical Society, or the Bancroft Library). In addition, black and white photographs could be added to the file of St. Joseph's Hospital's Nomination to the National Register of Historic Places, for eventual inclusion in the National archives. This measure would provide an historical record of the chapel prior to its alteration into residential units.
- The existing sanctuary space in the chapel building could be retained (not converted to three residential units) and could be used as a private community room by residents of the Park Hill Project. See Alternatives B and C for a discussion of a project alternative that would retain the chapel.

B. TRANSPORTATION, CIRCULATION AND PARKING

MEASURES PROPOSED AS PART OF THE PROJECT

- - The project sponsor would make available to project residents a presentation by RIDES to encourage car pooling.
- The project sponsor would pay the cost of installation of a stop sign and associated pavement control markings on the Park Hill Ave. approach to Roosevelt Way, if requested by the Department of Public Works' Traffic Bureau. This measure could help minimize the increased potential for traffic hazards at this intersection which has impaired lines-of sight.
- To prevent interference with neighborhood traffic and circulation and increased use of curbside parking spaces, all construction equipment and materials would be stored on site. This would also eliminate potential line-of-sight hazards caused by on-street storage of construction equipment.
- During the one month of excavation and grading activities, the project sponsor would require the contractor to wet down haul truck loads leaving the site. Implementation of the measure would minimize potential spills of earth and debris which would be a nuisance to neighborhood residents and could cause traffic hazards.
- The general contractor for the project would meet with the Department of Public Works to establish haul truck routes that would minimize impacts to residents and businesses along haul truck routes.

MEASURES NOT INCLUDED AS PART OF THE PROJECT

- - The project sponsor could pay for the cost of installing a bus shelter on Haight St. or Buena Vista Ave. East.
- Valet parking could be provided to meet the parking requirements of the project. On the assumption that parking spaces would not be assigned to individual units, valet parking would decrease on-street parking demand of the project by allowing the garage to be fully used at all times by project residents and their guests. Construction of fewer underground parking levels would be required for valet parking

V. Mitigation Measures

because 200 valet parking spaces would need less aisle and maneuvering area. Valet understaffing at peak activity could discourage garage use. The cost of providing valet parking service would increase the monthly homeowners' fees, and would therefore affect the affordability and marketability of the proposed units.

C. PARK AND RECREATION FACILITIES

MEASURES PROPOSED AS PART OF THE PROJECT

- To meet some of the recreational demand created by the project residents, the project would include open space (consisting of garden landscaping, footpaths and sitting areas), an indoor health club and a sundeck.

MEASURES NOT INCLUDED AS PART OF THE PROJECT

- The project sponsor is currently considering installation of a private outdoor swimming pool south of the hospital building as part of the project. Implementation of this measure could decrease demand for off-site public recreation facilities. Construction of a swimming pool would depend on space available on the site and climate suitability for an outdoor pool in this part of San Francisco.

- - As a condition of project approval, the City Planning Commission could require the project sponsor to contribute money for the installation of a path or stairs into Buena Vista Park directly across from the project site. This measure would encourage project residents to use a formal path instead of using informal paths, thereby minimizing increased erosion problems at the park. Implementation of this measure would have to be approved by the San Francisco Recreation and Park Department; implementation should also be coordinated with the Friends of Buena Vista Park.

- - The project sponsor could contribute money to the San Francisco Recreation and Park Department to be used for night lighting of tennis courts at public parks within the project vicinity. This measure would increase the amount of time when it would be possible for residents to play tennis, and therefore could reduce waiting times at the courts by spreading the use of the courts over a greater period of time. This measure has been rejected by the sponsor because such lighting could cause glare on nearby homes and because the light standards would be visible from off site. The sponsor also rejects this measure because night lighting could increase the potential for crime to the extent additional people used the courts at night.

V. Mitigation Measures

- - The sponsor has rejected a mitigation measure that would provide a tennis court on-site, or in existing parks. The proposed site plan does not allow for sufficient space to build a tennis court. Provision of a tennis court on site could cause glare effects on nearby homes, if lighted. A standard-size tennis court requires a 120 ft. by 60 ft. area.

D. ENERGY

MEASURES PROPOSED AS PART OF THE PROJECT

- All water heaters would be located as close as possible to the point(s) of use and all hot-water pipes would be insulated.
- Window area on the south sides of the new construction would be maximized and window and door areas on the north sides would be minimized.
- All existing windows would have weatherstripping added to reduce air infiltration and their frames would be sealed with long-life caulking to prevent infiltration between them and the walls.
- All exit doors of each unit, including those to interior halls, would be weatherstripped.
- Interior and exterior lighting would be primarily by energy-efficient light sources such as fluorescent fixtures.
- Multiple trash bins would be installed in place of single units, to encourage source separation of recyclable material.

V. Mitigation Measures

- Windows would be included on south-facing walls of the new construction, wherever suitable.
- Stairways would be prominently located adjacent to all elevators in the new construction, which would encourage their use; stairways exist near elevators in the existing hospital and convent buildings.
- Prior to final project design, the sponsor would meet with the Energy Conservation Department of the San Francisco Public Utilities Commission to discuss additional conservation measures which could be included in the project.

MEASURES UNDER CONSIDERATION

The City Planning Commission could, as a condition of project approval, require the sponsor to prepare and submit a report to the Department of City Planning (Energy Group) that would assess the cost effectiveness of the energy conservation measures listed below. For measures which would not be included in the project, the report would demonstrate why such measures would not be feasible. As part of the condition of approval, the City Planning Commission could also authorize the Department of City Planning to review this report and determine which measures would be required to be included prior to issuing the permit.

- passive solar energy design;
- thermal buffers along north ends of buildings to reduce interior heat loss;
- increase in natural interior illumination (daylighting) through atriums, skylights, etc.;
- exterior shading devices, such as horizontal overhangs on south facing windows -- these devices may also increase air circulation;
- heat reflective glass for all windows except north-facing windows;
- economizer cycle (which increases use of outside air) in air conditioning systems;
- computer monitoring systems for HVAC and lighting;
- alternative energy systems for hot water;
- heat recovery systems;
- use of a central heating plant;
- - exterior insulation on existing buildings.

VI. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

In accordance with Section 21067 of the California Environmental Quality Act (CEQA) and with Sections 15040, 15081 and 15082 of the State EIR guidelines, the purpose of this chapter is to identify impacts that could not be eliminated or reduced to an insignificant level by mitigation measures included as part of the proposed project, or other mitigation measures that could be implemented, as described in Chapter V, Mitigation Measures, pp. 70-73.

- With the mitigation measures included in the project or available for inclusion, increased shading, transit use, traffic, parking, public park use, and energy use resulting from the project would not cause a substantial, or potentially substantial adverse change in the environment. Project demand for public services and utilities would not reach or exceed available capacities (see discussion on p. 114-117). Therefore, there would be no significant environmental effects resulting from the project that cannot be avoided if the project is implemented.

VII. THE RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY.

While the project would eliminate other options for the short-term use of the site it would not limit the long-term use of the site in the time beyond the life of the project. The project would consume non-renewable resources and fuel but, by reusing the existing buildings instead of building all new dwellings, it would save resources and energy.

- By retaining the existing buildings on site and converting them into residential uses, the project would save open space and energy resources by reducing the need to encroach into previously unurbanized areas and to construct new residential developments. However, the scale and density of the project would alter the existing residential character of the immediate neighborhood. Project residents would increase the use of neighborhood parks, particularly Buena Vista Park. To the extent that this increased use would cause physical deterioration of Buena Vista Park, its overuse would compromise the value of the park as a community and City resource.

The sponsor believes that developing the site now rather than leaving options for other alternatives is justified because the site is presently available, because there is presently a market for the type of units proposed in this location, because leaving the existing buildings vacant would continue their deterioration, thus precluding their reuse in the future, and because the Buena Vista neighborhood is likely to remain residential for the foreseeable future and other uses permitted for a residential area were found to be infeasible for the project site./1/

NOTE - Short-Term Uses and Long-Term Productivity

/1/ John M. Sanger Associates, Feasibility Study: St. Joseph's Hospital Site, November 1980.

VIII. ANY SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH WOULD BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

Certain amounts of energy and materials used in the construction of the project would be irretrievable. Some energy sources would be renewable (hydroelectric power) and some amount of the material could be recycled at the end of the project's life depending upon the state of the recycling technology and market at that time. The project would not use as much energy and materials as similarly sized housing built entirely new. Extractable minerals below the site would not be accessible for the life of the project. The project would not require development or extension of urban systems which would commit this area to similar uses in the future. The intensification of residential use in the area and on the site, however, could increase the commitment to this use in the future.

IX. ALTERNATIVES TO THE PROPOSED PROJECT

In addition to the "no project" alternative required by CEQA, the alternatives discussed below have been identified by the Office of Environmental Review as those which would reduce or eliminate one or more impacts of the project. Alternatives A, B, and C would each develop fewer units on the site than are currently proposed in the project. The numbers of units proposed in these alternatives would be permitted within several different Planning Code Use (zoning) districts, ranging from the existing RH-2 district to RM-2 (see Table 2, below). The major environmental effects of each alternative are described and compared to those of the proposed project in Table 3, p. 87.

● TABLE 2: COMPARISON OF UNIT DENSITY ALLOWED BY RH-2 THROUGH RM-2 DISTRICTS WITH THE PROPOSED PROJECT AND ALTERNATIVES

Applicable Zoning	Allowable Density (1 unit per sq. ft. of lot area or minimum lot size for subdivision)	Total Allowable Units*		Alternative Analyzing Closest Comparable No. of Units
		Without PUD	With PUD	
RH-2	1 unit per 1,500 sq. ft.**	73	109	Alternative B: 109 units
RH-2	Subdivision of site into minimum lot sizes of 2,500 sq. ft.	88 ***	109	Alternative A: 88 units Alternative B: 109 units
RH-3	1 unit per 1,000 sq. ft.**	110	137	Alternative B: 109 units
RH-3	Subdivision of site into 44 lots	132 ***	137	Alternative C: 137 units
RM-1	1 unit per 800 sq. ft.	138	182	Alternative C: 137 units Alternative D: 182 units
RM-2	1 unit per 600 sq. ft.	183	274	Alternative D: 182 units Proposed Project: 200 units

* Based on a total site size of 110,000 sq. ft. and Section 209.1 of the City Planning Code.

** Requires Conditional Use Permit.

*** Based on Section 121(d) of the City Planning Code. Subdivision of the 110,000 sq. ft. site into 2,500-sq.-ft. lots could yield 44 lots; two-family dwelling units are permitted as a principal use in the RH-2 district; three-family units are permitted as a principal use in the RH-3 district.

SOURCE: San Francisco City Planning Code and Environmental Science Associates.

The discussion of alternatives describes the basic features of each alternative, compares its effects to those of the proposed project and presents reasons for its rejection by the project sponsor.

ALTERNATIVE A: DEMOLITION OF EXISTING BUILDINGS AND SUBDIVISION (NO SPECIAL APPROVAL REQUIRED)

DESCRIPTION

Development of Alternative A would demolish the St. Joseph's Hospital complex and subdivide the site into 44 lots of 2500-sq. ft. each (2,500-sq.-ft. lots are the minimum or standard lot size in the City). Construction of a two-family dwelling structure on each lot would provide a total of 88 units, 112 fewer than with the project. This alternative would comply with the present RH-2 Planning Code Use (zoning) district, and would not require a zoning reclassification or conditional use authorization for a Planned Unit Development (PUD). As required by Section 151 of the City Planning Code, a minimum of one parking space per residential unit would be provided, or two spaces per structure. A two-car garage could be provided on the ground-floor of each two-unit residential structure in this alternative.

COMPARISON OF IMPACTS

- Alternative A would demolish the former St. Joseph's Hospital complex, a property eligible for the National Register of Historic Places. In the opinion of the Landmarks Preservation Advisory Board, demolition of the complex would remove a cultural resource from the City.

The visually prominent outline of the St. Joseph's Hospital complex would be removed from the City skyline by implementation of this alternative. The proposed townhouse structures would not be constructed along Park Hill Ave.; about 10 units would be constructed in this portion of the site on five of the 44 lots instead of the 47 units that would be constructed in the proposed project. As the entire site would be uniformly subdivided, the interior open space proposed for the project would be replaced by housing units or rear yards of housing units.

The existing shadows cast by the hospital complex would disappear; new shadows would generally be shorter than project shadows, because the housing units would be about 30 ft. high (see City Planning Code, Section 261 for specific regulations that would determine the exact height in each case). For comparison, the buildings of the hospital complex, which range from 76 ft. in height along Buena Vista Ave. East to 50 ft. to 75 ft. on Park Hill Ave.

IX. Alternatives

Alternative A would generate about 55% less traffic and parking demand than the project. The City Planning Code (Section 151) would require that one off-site parking space be provided for each unit, so that a minimum of 88 new parking spaces would have to be constructed on-site. On the basis of parking demand factors ranging from 1.00 to 1.36 spaces per unit, Alternative A would generate demand for 88 to 120 spaces (see Table 3, p. 87). With at least 88 spaces provided on site, and with available curbside parking of 65 spaces on Buena Vista Ave. East alone, there would be an adequate supply of parking. Construction traffic impacts would be somewhat greater than for the proposed project, because of the increased demolition required by this alternative.

Increased demand for park and recreation facilities in the project vicinity would be 55% less than for the proposed project. Recreational use of Buena Vista Park by project residents could contribute cumulatively to the deterioration of pathways and increased erosion, as would the project; however the impact would be proportionately less than for the project. About 30 to 35 project residents would be tennis players; these residents could contribute to increased waiting times for existing tennis players at local courts in the Buena Vista neighborhood.

This alternative would require about 55% less energy than the proposed project. A greater amount of natural resources and manufacturing energy would be consumed by this alternative than by the proposal.

Demolition of the existing buildings would result in additional dust generation and truck trips during the the construction period.

Alternative A would allow development of 88 additional housing units on the site and increase the population by about 130 to 155 persons (based on an average household size of 1.5 to 1.75 persons). The unit density of this alternative would be 35 units per acre, as compared to the project density of 80 units per acre.

STATUS OF ALTERNATIVE A/1/

The project sponsor would not develop Alternative A. The sponsor believes that the existing buildings are well suited for a residential use and have a unique architectural style and historical value that would make them eligible for selection to the National Register of Historic Places.

ALTERNATIVE B: USE OF EXISTING BUILDINGS ONLY (TWO PARKING SPACES PER UNIT)

DESCRIPTION

Alternative B would provide two on-site parking spaces for each residential unit developed. In this alternative, the existing hospital and convent building would be refurbished into a total of 109 units; no new construction of residential units would occur along Park Hill Ave. The existing chapel building would be retained and could be used for a private community room by residents of the Park Hill project. Alternative B is supported by the Buena Vista Neighborhood Association and was included in the EIR at the request of neighborhood residents.

Alternative B would not require a zoning reclassification, as would the proposed project. It would, however, require a Conditional Use authorization for a Planned Unit Development (PUD) for development of up to 36 units more than would be allowed in an RH-2 district (73 units) without a PUD. A PUD would also be required for adjustments to rear-yard and parking requirements.

This alternative would provide a total of 218 parking spaces, 109 more spaces than the minimum of one space per unit required by Section 151 of the City Planning Code. The additional 109 spaces would require a Conditional Use authorization under Section 157 of the City Planning Code. The 218 parking spaces would be developed along Park Hill Ave., on the location of the existing surface-level parking lot. The parking would be constructed on three levels, two of which would be underground. The first level would be at the surface elevation (405 ft.) and would contain about 70 parking spaces; the first subsurface level would be at an average elevation of 395 ft. and would contain about 78 parking spaces; the second subsurface level would be at an average elevation of 385 ft. and would contain about 70 parking spaces. A tennis court could be constructed on top of the surface level parking. This would eliminate a 15-ft.-wide area along the eastern edge of the interior driveway.

COMPARISON OF IMPACTS

This alternative would not change the existing visual appearance of the site, as all existing buildings would be retained and no new construction would occur. The portion of the site proposed for surface parking in this alternative currently contains a parking lot and the subsurface levels would not be visually noticeable from off-site. No new shadows would be cast on Park Hill Ave., as the townhouse structure would not be built.

Traffic impacts would be about 45% less than those of the proposed project. Construction traffic would be similar to that for the proposed 200-unit project. Assuming the same parking demand per unit rate as used to estimate project parking demand, total parking demand of Alternative B would be for 109 to 148 spaces;^{2/} this demand could be fully met on-site and there would be minimal use of curbside parking spaces by project residents and their guests.

- This alternative would increase the population of the area by 165 to 190 persons. The demand for park and recreation facilities in the project vicinity would be 45% less than the demand of the proposed project. Recreational use of Buena Vista Park by project residents could contribute cumulatively to the deterioration of pathways and increased erosion, but the impact would be proportionately less than for the project. An estimated 40 to 45 project residents would be tennis players. As Alternative B would provide a tennis court, impacts on the waiting times at nearby courts would be minimal. The deck of the tennis court would be about 10 ft. above the ground-level parking area. An 8-to 12-ft.-high mesh screen or fence would be required to enclose the court. The tennis court deck and screen above the surface-level parking would be about 22 ft. high, 4-22 ft. lower than the new construction proposed for the project. If night lighting is proposed for the courts, glare from the lights could affect the residents on Park Hill Ave. opposite the site.

Energy requirements for this alternative would be about 45% less than those for the project.

- Alternative B would provide 109 housing units on the site, the maximum number allowed under the existing RH-2 district. The unit density for Alternative B would be about 45 units per acre. This density would be 35 fewer units per acre than that of the proposed project, and 17 units more than the actual density in the RH-2 district within 300-ft. of the site.

ALTERNATIVE B: VARIANT

Alternative B could also develop more than 109 units on-site with two self-park parking spaces provided for each unit. Approximately 150 units could be developed with 300 parking spaces. However, provision of more than about 220 parking spaces would require construction of a one-level parking structure above grade. The parking structure would be constructed along Park Hill Ave., in the area planned for the new townhouses in the proposed project. This structure would be about 10-15 ft. in height and contain four levels

IX. Alternatives

of parking, two of which would be underground. There would be one level of parking at ground level; another at level above grade (in addition to the two subsurface parking levels). A one-level parking structure would have fewer visual impacts than would the new construction as the structure would be shorter than the existing houses on Park Hill Ave. and would be almost fully screened by the existing landscaping. A one-level parking structure also would not affect views to the east from Buena Vista Park.

A parking structure could alter the residential character of Park Hill Ave. The one-level parking structure would have negligible shadow impacts on the sidewalks and roadway of Park Hill Ave.; shadows from the structure would not extend onto residences or sideyards.

STATUS OF ALTERNATIVE B/1/

The sponsor has rejected Alternative B for design and economic reasons. The existing buildings, particularly the hospital, are well suited for one-bedroom units. Conversion of

the buildings into 109 units would result in large units with inefficient floor plans that would not compete well in the City's residential market. Each unit would be more expensive than those of the proposed project because of the added floor area of each unit and the increased proportion of land and fixed costs added to each unit.

Alternative B would not provide new construction. The project sponsor and architect believe that the new construction would visually integrate the existing complex of buildings into the surrounding community. The new townhouse structures would provide a transition in scale from the low, single-family units to the taller hospital and convent buildings.

Provision of two parking spaces per unit would further increase the cost of each unit. Development of more than about 220 spaces on-site would require construction of a parking structure above grade to avoid underpinning problems related to excavation adjacent to the hospital building.

● ALTERNATIVE C: USE OF EXISTING BUILDINGS ONLY (ONE PARKING SPACE PER UNIT)

DESCRIPTION

In this alternative, the existing hospital and convent building would be refurbished into a total of 137 units; no new construction of residential units would occur along Park Hill Ave. The chapel would be maintained for non-residential use and could be used for community or recreational activities by the residents of the Park Hill project.

Alternative C would require a zoning reclassification to RH-3, as well as a Conditional Use authorization for a Planned Unit Development (PUD) for development of up to 27 units more than the 110 units that would be allowed in an RH-3 district without a PUD. Alternative B analyzes 109 units, which is one unit fewer than the number permitted in an RH-3 district without a PUD. Therefore, the analysis of Alternative C includes only an RH-3 district with a PUD authorization.

This alternative would provide one self-park parking space for each unit, a total of 137 parking spaces. These spaces would be provided on two levels. One underground level would provide 79 spaces at elevation 395 ft. along Park Hill Ave. with an exit/entrance at the same location as for the project. The second parking level would be at surface level, decked over the parking level at the 395 ft. elevation, and would provide 58 spaces with an exit/entrance east of the hospital building. The two parking levels would not be connected to each other.

COMPARISON OF IMPACTS

This alternative would not change the existing visual appearance of the site, as all existing buildings would be retained and no new construction would occur. The portion of the site proposed for surface parking in this alternative currently contains a parking lot. No new shadows would be cast on Park Hill Ave., because the townhouse structures would not be built.

Traffic impacts would be about 30% less than those of the proposed project. Construction traffic would be less than that of the project which proposes 47 units of new construction. Assuming the same parking demand per unit as used to estimate project parking demand, total parking demand of Alternative C would be for 137 to 186 spaces.

Alternative C would increase the population of the area by 205 to 240 persons. The demand for park and recreation facilities in the project vicinity would be 30% less than the demand of the proposed project. Recreation use of Buena Vista Park by project residents could contribute cumulatively to the wear on pathways and increased erosion, but the impact would be proportionately less than for the project. An estimated 50 to 55 project residents in Alternative C would be tennis players; these residents could contribute to increased waiting times for existing tennis players at local courts.

Energy requirements for this alternative would be about 30% less than those for the project.

Alternative C would allow development of 137 housing units on the site. The unit density for Alternative C would be about 55 units per acre, 25 units per acre fewer than for the proposed project.

ALTERNATIVE C: VARIANT

This alternative could include the acquisition of some or all of the four adjacent lots owned by St. Joseph's Hospital (Assessor's Lots 15, 16, 17 and 18) and the development of some elderly/handicapped units. Further acquisition of the four lots would permit up to 152 units under a PUD within the RH-3 District. This alternative would provide units for persons with a high priority need for housing.

Under the Alternative C variant, the sponsor would build approximately 136 regular condominiums and approximately 32 elderly/handicapped units. (Every two elderly units would be counted as one unit (Section 209.1(m) of the City Planning Code). The acquisition of adjacent lots and the double density allowed for elderly/handicapped would permit a greater density on the site without rezoning to a higher district.

The Planning Code requires 20% fewer parking stalls for elderly/handicapped units than for required regular units. The project sponsor would consider providing one parking space for each unit, a total of 168 spaces under this alternative. This would be 26 spaces more than would be required by the City Planning Code.

"The 168 units provided in this variant to Alternative C would result in 1176 person trip ends and approximately 504 vehicle trip ends per weekday with 50 vehicle trip ends occurring during the p.m. peak-hour.

- "The demand for park and recreation facilities would be about 16% less than for the proposed project, with about 63-73 of the project residents playing tennis on a regular basis.

"Energy requirements of this variant to Alternative C would be proportionately less than those of the project (about 16%). Alternative C would develop 168 additional housing units on the site and increase the population by 252 to 294 persons. For comparison, the project population would be about 300-350 persons."

Traffic, parking and recreation demand of this alternative could be further reduced because 32 of the proposed units would be occupied by elderly residents.

STATUS OF ALTERNATIVE C /1/

The project sponsor is considering developing the Alternative C Variant, but has rejected the 137-unit alternative for design and economic reasons. The sponsor believes that the hospital and convent buildings are best adapted for development of about 150 units. The development of fewer units would result in unused spaces or larger, more expensive units with inefficient floor plans.

The date "May 12, 1983" has been added to footnote /1/ on p. 86 of the EIR.

ALTERNATIVE D: USE OF EXISTING BUILDINGS AND REDUCED-SCALE NEW CONSTRUCTION

DESCRIPTION

A total of 182 units would be provided in Alternative D. As with the proposed project, a total of 153 units would be developed in the hospital, convent, and chapel buildings. However, new construction along Park Hill Ave. would be about 30 units, 17 fewer than proposed in the project. As with the project, Alternative D would require a zoning reclassification and Conditional Use authorization for a Planned Unit Development (PUD). Alternative D would require a zoning reclassification from an RH-2 district to an RM-1. A PUD would be required to allow flexibility in zoning requirements such as rear yard setbacks, and to allow about 45 units more than would be allowed without a PUD (137 units).

Alternative D would provide one parking space per unit, a total of 182 spaces. Parking would be located under the new construction in three subsurface levels. The internal driveway could be eliminated in this alternative, so that vehicle access to the site would be exclusively through a garage entrance on Buena Vista Ave. East.

COMPARISON OF IMPACTS

Visual impacts of this alternative would be similar to those of the proposed project, except that 17 fewer units would be constructed along Park Hill Ave. than for the proposed project. The massing of structures along Park Hill Ave. would be less dense and the shadows cast by new project construction would be reduced accordingly. If the internal driveway were to be eliminated, there would be more opportunity for interior landscaping in this alternative than in the proposed project.

The 182 units provided in this alternative would result in about 9% less impact on traffic and parking demand than the project. Parking demand would be similar to that of the proposed project, totalling 182-248 spaces as compared to total project demand of 200-272 spaces. Construction traffic effects would be similar to, but slightly less than those of the project.

The demand for park and recreation facilities in Alternative D would be 10% less than for the proposed project. To the extent that project residents did not use designated pathways, this would increase hillside erosion in Buena Vista Park; this impact would be less than that for the project. An estimated 65 to 75 project residents would be tennis players; these residents could contribute to increased waiting times for existing tennis players at local courts.

Energy requirements for this alternative would be about 10% less than those for the project.

Alternative D would develop 182 additional housing units on the site and increase the population by about 275 to 320 persons. As with the proposed project, this alternative could set a precedent for reclassifying several lots south of the site which are owned by St. Joseph's Hospital (Assessor's Lot Nos. 15, 16, 17, 18 and 22) to a higher-density district than the existing RH-2.

STATUS OF ALTERNATIVE D/1/

Alternative D has been rejected because of design and economic considerations. The sponsor believes that the greatest demand for new housing in San Francisco is for small, competitively priced units that provide a distinctive location and design. Reducing the

project from 200 to 182 units would make units less affordable; the price of each unit would increase because each unit would bear a proportionately higher share of the cost of acquiring and developing the site. The sponsor has also rejected this alternative because construction of 30 instead of 47 units would detract from the project's design concept. New townhouse construction at a reduced scale would not provide a sufficient visual transition from the existing residences to the taller hospital and convent buildings. In the proposed project, the new construction as viewed from a distance (i.e., Market St.) is designed to be seen as a line of tile roofs stepping upward toward the higher, similarly designed, roofline of the hospital building. A reduction in the new construction also would not effectively balance the scale of the hospital building and not create as sheltered a courtyard for project residents.

ALTERNATIVE E: NO PROJECT

This alternative would retain existing conditions at the project site, as described on pp. 26 to 39. It would also preserve options for future development of the site, including reinstatement of a hospital use at the site.

RETAIN EXISTING CONDITIONS

The visual appearance and shadows cast by the hospital complex would not be changed from their present condition.

If existing conditions were to remain at the site, the 60 employees of Children's Hospital would continue to work in the hospital building, and Buena Vista Ave. East would continue to carry about 200 vehicle trips per hour. Peak parking demand would occur during daytime working hours and would not coincide with peak weeknight and weekend parking demand for curbside spaces by neighborhood residents.

The no project alternative would not increase the demand for park or recreation facilities in the area and would not change the present energy requirements of the site for 4,129 therms of gas and 373,950 kWh of electricity annually.

RETURN TO HOSPITAL USE

The visual appearance and shadows cast by the hospital complex would remain unchanged from existing conditions.

The 112,000-square-foot hospital building would be expected to generate about 1,900 weekday trips, or 200% more trips than would the proposed project.^{/3/} Although the City Planning Code (Section 151) would require that about 50 parking spaces be provided for a hospital use at the site (one space for every 2400 sq. ft. of space devoted to sleeping rooms), about two parking spaces typically are provided per 1,000 sq. ft. of hospital floor area by other hospitals in the Bay area. With the latter formula, there would be a total of about 225 parking spaces.^{/3/} The existing St. Joseph's Hospital complex provides about one space per 1,000 sq. ft. (or 110 spaces, counting the 66 curbside spaces on Buena Vista Ave. (along the project frontage) and the 45 parking spaces currently provided on-site). A parking deficit could develop with some types of hospital use of the building. Peak-hour traffic that would be generated by a hospital use at the site probably would not coincide with peak-hour traffic of the residential uses in the neighborhood.

This alternative would slightly raise the daytime demand for park and recreation facilities in the project vicinity, especially during workers' lunch hours. The higher demand would not coincide with peak demand on weekends by neighborhood residents. A hospital use at the site would consume an estimated 54.8 billion at-source Btu annually^{/4/}, a 300% increase over the project's annual consumption of 13.3 billion Btu at-source.

STATUS OF ALTERNATIVE E/1/

The no-project alternative has been rejected by the sponsor because it would be an economic underuse of the site. Reinstitution of a hospital use at the site has been rejected because it would be in conflict with the citywide efforts to consolidate hospital services in the City and reduce the number of surplus beds. A feasibility study prepared by John Sanger and Associates found no feasible medical uses for the existing hospital^{/5/}, which is outdated and does not meet current State seismic requirements for hospital buildings, which are more stringent than for multi-family dwellings. Alternative E would also result in a loss of potential infill housing in the City.

NOTES - Alternatives

- /1/ Stephen R. Koch, Project Manager, Prometheus Development Company, written communication, February 25, March 4, and May 12, 1983.
- /2/ Planners disagree on the exact parking demand effect of providing a higher parking/unit ratio. One point of view maintains that providing for more automobiles attracts more automobiles. Another point of view maintains that while the above theory may apply to an entire system (i.e. building freeways throughout an entire city), it would have very limited applicability to a single development in a built-up city where the surrounding land uses and transportation systems are developed. The availability of parking could be one of many items noted by a household with more than one vehicle and parking availability may be one factor which could encourage a household which is established in a certain home to purchase an additional vehicle. However, a variety of factors are considered in deciding where to live and parking availability may not be the overriding consideration.
- /3/ John Wiley, 1981, Architectural Graphics Standards, 7th Edition.
- /4/ Tenth Progress Report on Trip End Generation Research Counts, July, 1975, Caltrans; and Trip Generation, Institute of Traffic Engineers, 1975.
- /5/ Romeo Zavala, St. Anne's Hospital (an affiliate of the former St. Joseph's Hospital), written communication, March 14, 1983. Energy consumption estimates are based on PGandE bills for St. Joseph's Hospital from September 1978 through September 1979. During this period, the hospital consumed 43.9 billion therms of gas and 10.8 billion kW, an equivalent of 54.8 billion at-source Btu. This hospital consumption is about 300% more than the project's estimated annual consumption of 13.3 billion at source Btu.
- /6/ John M. Sanger Associates, Feasibility Study: St. Joseph's Hospital Site, November 1980.

TABLE 3: COMPARISON OF PROJECT IMPACTS TO IMPACTS OF ALTERNATIVES

		ALTERNATIVE A	ALTERNATIVE B	ALTERNATIVE C	ALTERNATIVE D	ALTERNATIVE E	
	Proposed Project	Demolition of Existing Buildings	Use of only Existing Buildings Two Parking Spaces per Unit*	Use of only Existing Buildings One Parking Spaces per Unit	Use of Existing Buildings and Reduced-Scale New Construction*	No Project Site Remains as Is	Hospital Use
No. of units	200	88	109	137	182	0	N/A
Applicable Zoning	RM-2 with PUD	RH-2	RH-2 with PUD	RH-3 with PUD	RM-1 with	N/A	N/A
New Construction on Park Hill	47 units	up to 10 units	None	None	None	N/A	N/A
Residential Population	300-350	130-155	165-190	205-240	275-320	N/A	N/A
Traffic Generation	600 vehicle trip ends per weekday	55% less than project	45% less than project	30% less than project	9% less than project	70% less than project	200% more than project
Parking Spaces per unit	1 per unit	1 per unit	2 per unit	1 per unit	1 per unit	N/A	N/A
Total Parking Demand (spaces)	198-272	88-120	109-148	137-186	182-248	0	225
Off-Site** Parking Demand	40-80	18-35	0***	0-49	36-70	65	115
Creation of New Shadows on Park Hill Avenue	Yes, see Figures 19 - 21, pp. 46-51	Yes, but less than project	No	No	Yes, but less than project	No	No
Increased* Demand for Recreation Facilities	70 to 80 tennis players	55% fewer players	45% fewer players	30% less fewer players	10% fewer players	N/A	N/A
Annual Energy Use at Source	13.3 Btu	55% less than project	45% less than project	30% less than project	10% more than project	70% less than project	300% more than project
Density (units per acre)	80	35	45	55	72	N/A	N/A

*Alternatives B and D would require a PUD to allow for flexibility in zoning requirements such as rear-yard setbacks. The table to the unit density bonus allowed for PUD by Section 305 of the City Planning Code is the amount used in the table.

**Off-site parking demand is included in the total parking demand estimates above.

***Based upon on-site stalls available compared to total demand. There would be no guarantee that project-related vehicles would always be parked in the on-site garage.

*See third row above for the number of potential new park users in the project vicinity.

SOURCE: Environmental Science Associates

● X. SUMMARY OF COMMENTS AND RESPONSES

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SUMMARY OF COMMENTS AND RESPONSES

A. INTRODUCTION

This document contains summaries of the public comments received on the Draft Environmental Impact Report (EIR) prepared for the proposed Park Hill Residential Project, and responses to those comments.

All substantive spoken comments made at a public hearing before the City Planning Commission on April 28, 1983, and all written comments received during the public review period from March 25, 1983 through April 28, 1983, have been reviewed and are presented herein by direct quotation, edited to omit repetition and nonsubstantive material only.

The Buena Vista Neighborhood Association prepared comments on the Draft EIR in the form of a Community Response Document. Comments contained in that document are indicated by (CRD) after the comment. Many of the oral comments received at the public hearing duplicate those in the Community Response Document. (In such cases, credit is given to both the CRD and the person who made the comment at the hearing.) The CRD contained several appendices; where appropriate, information from those appendices has been incorporated into a response and referenced to the CRD.

Comments and responses are grouped by subject matter and are generally arranged by topics corresponding to the Table of Contents in the Draft EIR. Therefore, comments will not always appear in the order they were given in the CRD or at the public hearing.

Each group of comments is followed by its set of responses; the order of the responses under each topic follows the order of the comments under that topic. As the subject matter of a topic may overlap that of other topics, the reader must occasionally refer to more than one group of comments and responses to review all information on a given topic. Where this occurs, cross references are provided. Unless noted otherwise, all page references refer to this document.

This Comments and Responses document will be incorporated into the Final EIR as a new chapter. Text changes resulting from comments and responses will also be incorporated into the Final EIR, as indicated in the responses.

B. LIST OF PERSONS COMMENTING

Susan Bierman, City Planning Commissioner

Douglas Wright, City Planning Commissioner

William Andrews, Eureka Valley Promotion Association

Buena Vista Neighborhood Association (Community Response Document)

Bill Benning

Graham Bryan

Dorothy Campbell (Represented by Ms. Incerti), Buena Vista Neighborhood Association

Alex Gilbert Captanian, Buena Vista Neighborhood Association

Dale Champion, Buena Vista Neighborhood Association

Grant Dehart, Foundation for San Francisco's Architectural Heritage

Greg Gaar

Lee Gilbert, Mount Olympus Neighborhood Association

Dick Glyer

Peter Hennessy

John Hooper, Buena Vista Neighborhood Association

Molly Hooper, Buena Vista Neighborhood Association

Michael Immel

Joanne Jonas, Buena Vista Neighborhood Association

John Lavrich

Rauline A. Layer, San Francisco Tomorrow

Johnathan H. Malone,
Landmarks Preservation Advisory Board

Richard Rothman

Isabel Wade, Friends of Buena Vista Park

Janice Windborne

C. SUMMARY OF COMMENTS AND RESPONSES

1. SITE AND FLOOR PLANS

a. Site and Floor Plans

COMMENT

"The EIR Draft primarily focuses on off-site environmental impacts. As responsible citizens, we know that environmental quality does not begin and end at property lines. We must also be concerned about the quality within proposed projects and evaluate them from both the inside view and from the outside view. The existing site is an odd jumble of unrelated buildings at drastically different elevations. To date the sponsor has failed to show exactly how all these buildings might function as an integrated site development." (CRD, pp. 48-49)

"Figure 2, page 12, the site plan is lacking substantial information. Without showing building entrances, building organization and function are unclear. Ground floor plans of the hospital, convent and new construction are conspicuously absent. Without ground floor plans, the buildings lack any relation to the site. Critical to intensive developments are door and garage security systems; nowhere in the EIR Draft are such systems mentioned. How safe, for example, will unescorted women feel in a parking garage 30 ft. below street level? What incentives/requirements will be designed to encourage residents to descend into this pit rather than park in the streets in the area." (CRD, pp. 49-50 and Michael Immel)

"Interior space planning: Figure 4, page 14, a typical hospital floor plan shows a long blind corridor with only one elevator location - 200 ft. from the farthest apartment. Daylighting is poor: baths typically have no windows, and some kitchens are more than 25 ft. from the nearest natural light source (Fig. 5 [a], p. 15). The chapel residential adaptation is confusing: how is entry gained from the site to unit No. 1? (Fig. 6, p. 16). The dining room in the apse is 36 ft. from the nearest window. In addition to ground floor plans, the upper 6th floor of the hospital should be shown indicating access to the sunroof." (CRD, p. 50 and Michael Immel)

"The EIR Draft is incomplete and misrepresents actual site conditions. Interior space planning lacks adequate daylighting, is energy consumptive, and site natural factors are given only inaccurate, cosmetic treatment . . ." (CRD, p. 49 and Michael Immel)

"p. 23 (sic) [22] -- Please locate swimming pool on map." (CRD, p. 59)

"The [underground] tunnel that leads from the hospital to the nursing college is to remain open. What use and what function will this passageway have? What is planned for the existing boiler room?" (CRD, p. 49 and Michael Immel)

"p. 70 -- How much 'set back' will be provided for new construction?" (CRD, p. 62)

"p. 18 (sic) [19] Chart is useless. Should show height of buildings on Park Hill Avenue." (CRD, p. 59)

"p. 19 -- Heights in diagram do not coincide with figures given in text. Because of complex topography, several elevations - including one showing 4 story portions of new

X. Summary of Comments and Responses

construction - should be provided. New additions appear to violate height limitations for this area? Please explain, indicating points from which measurements are taken to comply with city code as well as giving measurements from several curb side locations along Park Hill Avenue to the highest points of the new construction." (CRD, p. 59)

RESPONSE

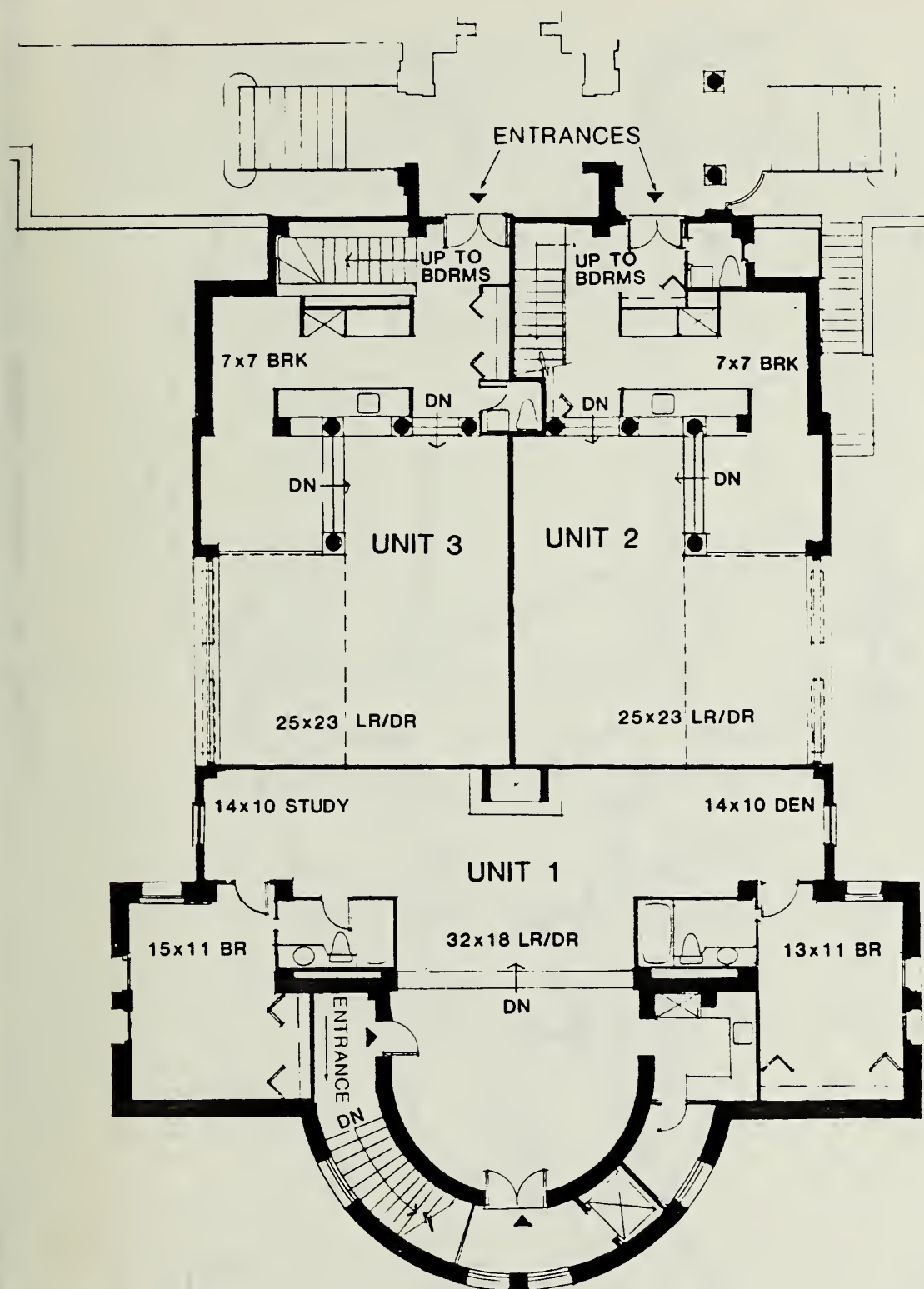
The EIR presents site and floor plans which are at an appropriate level of detail for an EIR. The relationship of the buildings are shown in Figure 2, Site Plan, on p. 12 of the Draft EIR. Representative floor plans of each building are shown in Figures 4-6a on pp. 14-16a. The appropriateness of design features, including the functional integration of the buildings, will be reviewed and possibly altered by the City Planning Commission as part of the Planned Unit Development application and by the Department of City Planning during the site and building permit approval process.

One of the objectives of the project is to adaptively reuse the existing buildings. By retaining the buildings, the design of individual units is necessarily constrained by the existing layout of the structures. Wherever possible, units have been orientated to maximize daylighting, particularly for living rooms and bedrooms. Daylighting in the hospital building is maximized because of the narrow depth of the proposed units (18 ft.). Most of the kitchens in the hospital building are 12 ft. from existing windows. The proposed project would be integrated by the interior driveway/plaza and by the design of the new construction which is intended to complement the existing buildings.

Figure 6, Chapel Building Floor plan on p. 16 of the Draft EIR has been revised to explain the entry to Unit 1. Because of the grade difference of the site, the resident of Unit 1 would enter from a stairway up to the dining room (see revised Figure 6a on p. 16a of this document).

The sixth floor of the hospital is shown in a new Figure 4b that will be incorporated into the Final EIR; access to the sunroof is also indicated in that figure (see p. 96).

The ground-floor plan of the chapel is shown in Figure 6 on p. 16 of the Draft EIR. Building entrances to the chapel are now shown in the revised Figure 6. Ground floor plans of the hospital and convent have been added to the EIR as Figures 4 and 5 (see pp. 97-98). (The existing Figures 4 and 5 have been changed to Figures 4a and 5a, respectively.) The interior design of the new construction has not as yet been completed by the project sponsor and architect. (Stephen Koch, Project Manager, Prometheus Development Company, letter communication, May 12, 1983). The conceptual ground-floor plan of a typical townhouse has been included in the EIR as Figure 6a (see p. 99). As stated in the Final Initial Study on p. 238 of the EIR, the project would incorporate internal security measures such as well-lighted entries, alarm systems, and locked entrances with security telephone. The project sponsor states that locations and specific types of door and security systems have not been decided upon. These decisions would not be made until advanced stages of project design (Stephen Koch, Project Manager, Prometheus Development Company, written communication, May 12, 1982).



UNIT 1	1450 S.F.
2 BDRM	
2 BATH	
UNIT 2	1580 S.F.
2 LEVELS	
2 BDRM	
2 1/2 BATH	
UNIT 3	1580 S.F.
2 LEVELS	
2 BDRM	
2 1/2 BATH	
TOTAL	
FLOOR 1	3270 S.F.
LOFT	1330 S.F.
	4600 S.F.



NOTE The entrance to Unit 1 is one level below the unit and is served by the stairway and elevator shown on the plan.

FIGURE 6: Chapel Building Floor Plan (Entry Level)

SOURCE: Kaplan/McLaughlin/Diaz

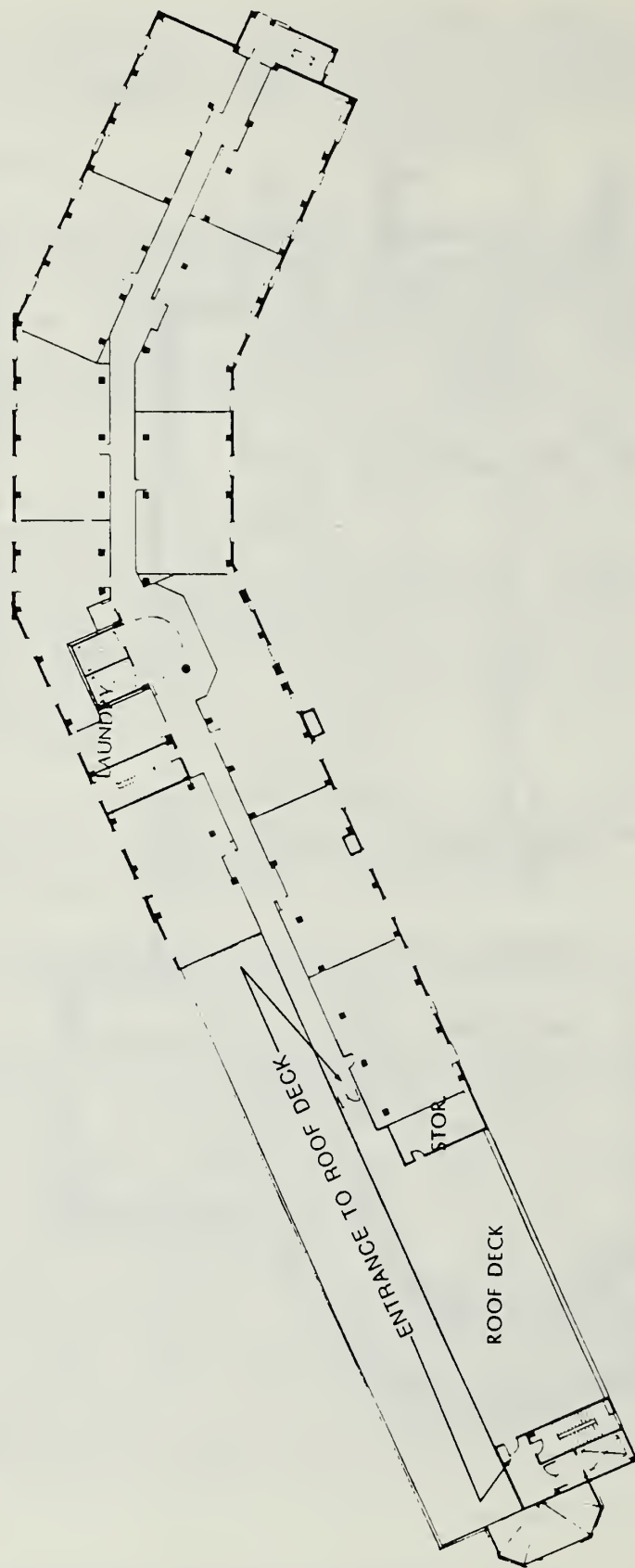


FIGURE 4b: Hospital Building Floor Plan (Roof Level 6)

SOURCE: Kaplan/McLaughlin/Diaz

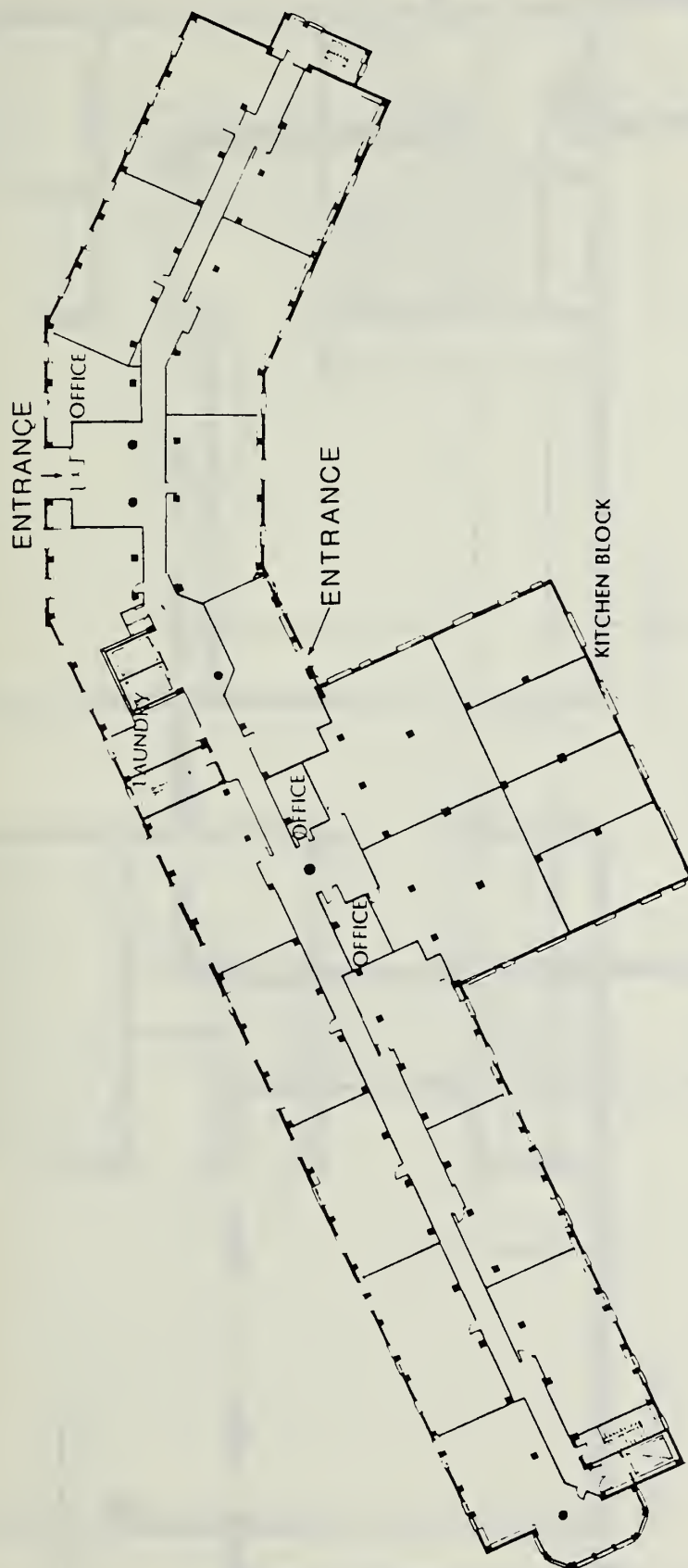


FIGURE 4: Hospital Buildings Floor Plan (Entry Level)

SOURCE: Kaplan /McLaughlin/Diaz

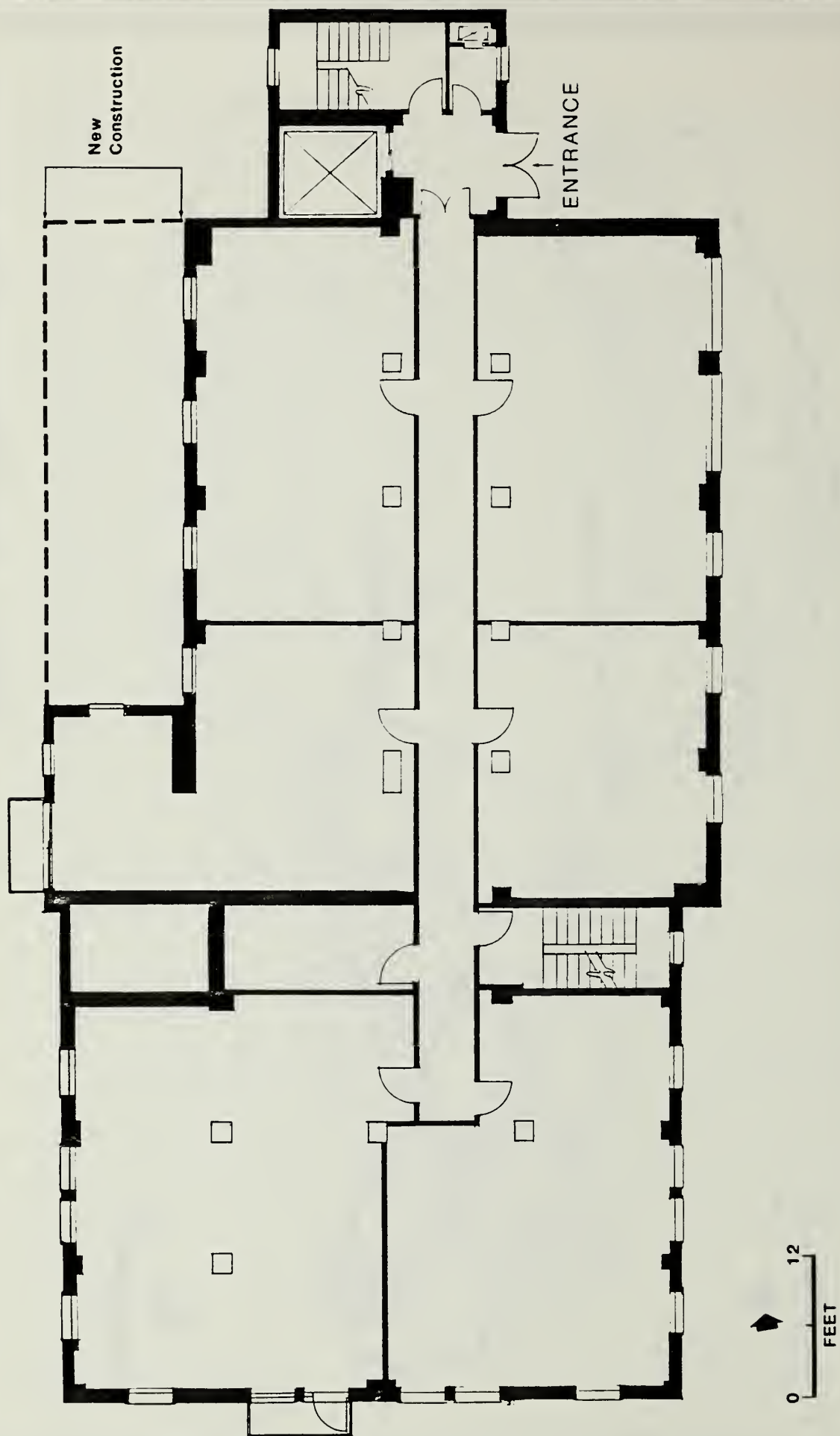
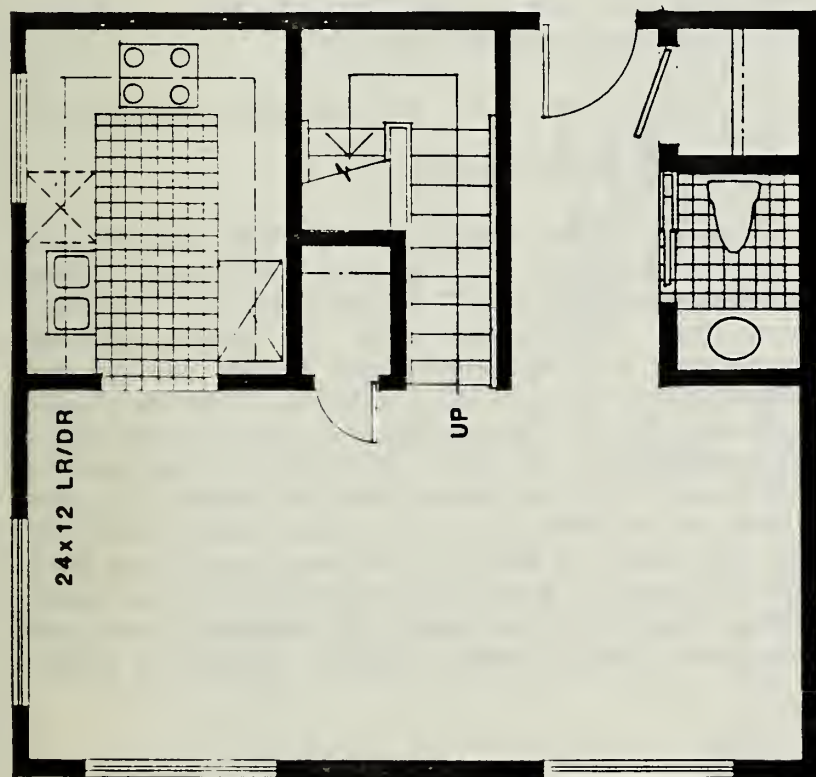
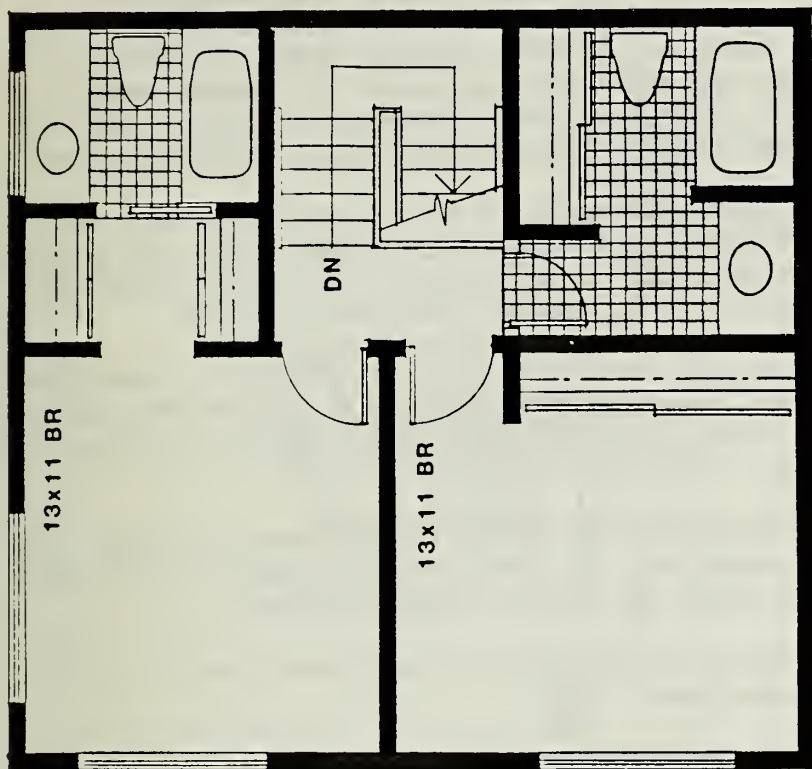


FIGURE 5: Convent Building Floor Plan (Ground Floor)

SOURCE: Kaplan/McLaughlin/Diaz



LOWER LEVEL



UPPER LEVEL

UNIT T
2 LEVEL
2 BEDROOM
2 1/2 BATH
1100 S.F.

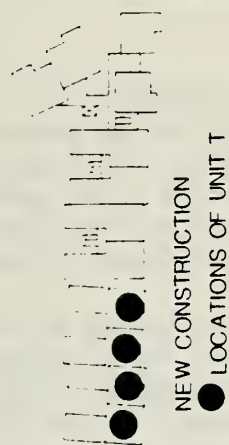
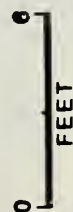


FIGURE 6a: New Construction (Typical Unit Floor Plan)

SOURCE: Kaplan/McLaughlin/Diaz

X. Summary of Comments and Responses

Valet parking is discussed on p. 71 of the Draft EIR as a mitigation measure not included in the project. Valet parking service could provide a staff person for the garage on a 24-hour basis and would minimize the need for project residents to be unescorted in the garage. Should this measure be adopted by the project sponsor or required by the City Planning Commission as a condition of project approval, potential danger to project residents using the garage would be substantially reduced.

Any deficiencies in the interior space planning of the project are not an inaccuracy of the EIR. Refer to Section 9. ENERGY, for a discussion of daylighting and energy requirements of the project. Conformance of the project with seismic standards is discussed in Section 10. EXCAVATION, FOUNDATION and STRUCTURAL.

Figure 11, Parking Level Elevation 375, on p. 22 of the Draft EIR shows a subsurface parking level. The outlines of buildings are shown in Figure 11 to orient the reader, and are not intended to depict a surface-level site plan. The location of the pool can be seen in Figure 2, Site Plan, on p. 12 of the Draft EIR.

The tunnel that leads from the hospital to the nursing college would be closed. The boiler room is located on the lower levels of the southern portion of the convent building. The boiler room will be converted into three residential units.

Building set backs of new construction on Park Hill Ave. would vary from 10 to 30 ft. from the property line, an average of about 20 ft.

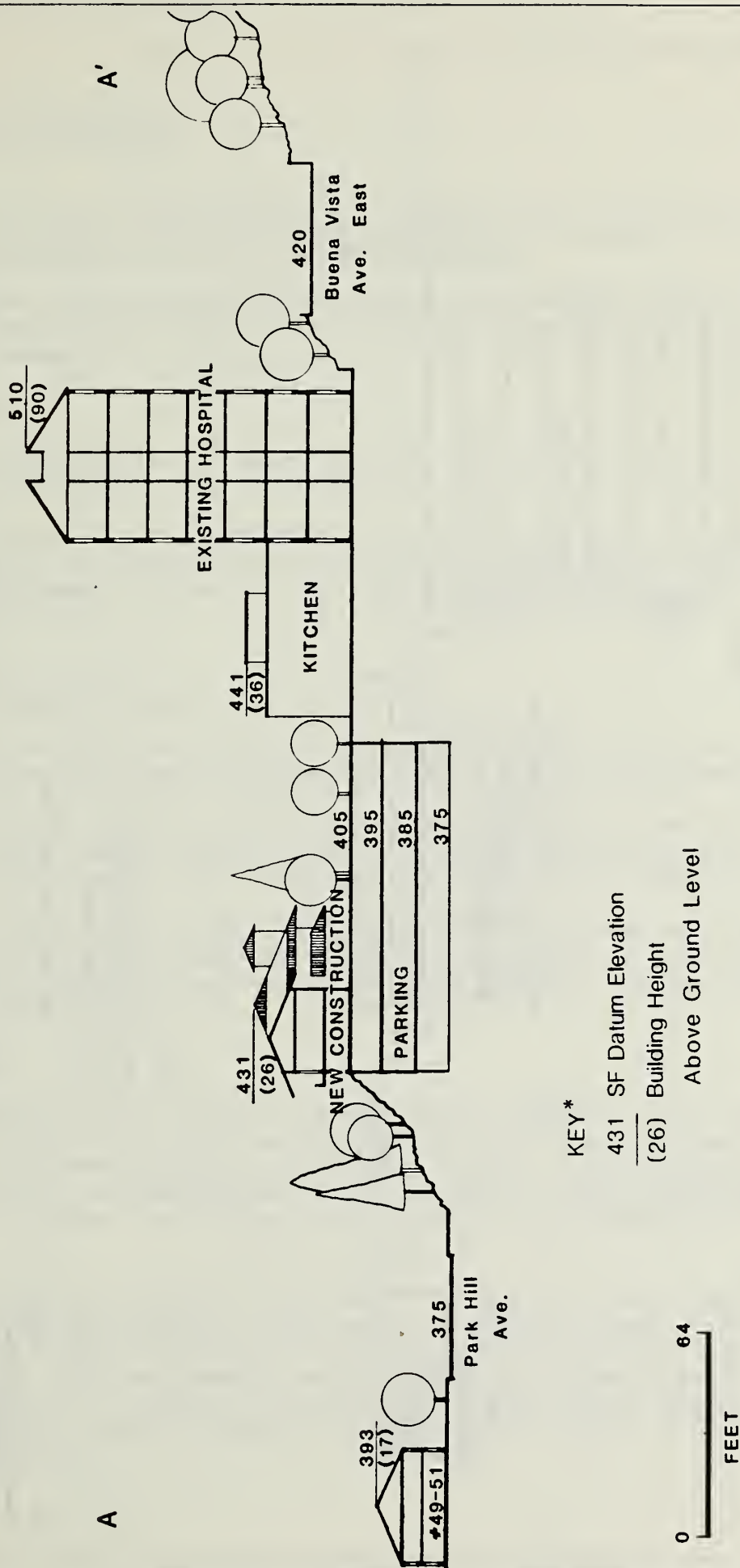
The Site Section, Figure 8 has been revised to show the height of the residences at No. 49-51 Park Hill Ave. (see p. 101). The section is drawn to scale, allowing relative comparisons in scale to be made without indicating building heights.

A new Figure 8a has been added to the EIR (see p. 102). Figure 8a shows a section located at the tallest point of the four-story townhouse structures.

"On p. 17 of the Draft EIR, the first phrase of the fifth sentence, of the first paragraph, has been changed to read:

"The two-story, 26-ft.-high townhouse structures . . ."

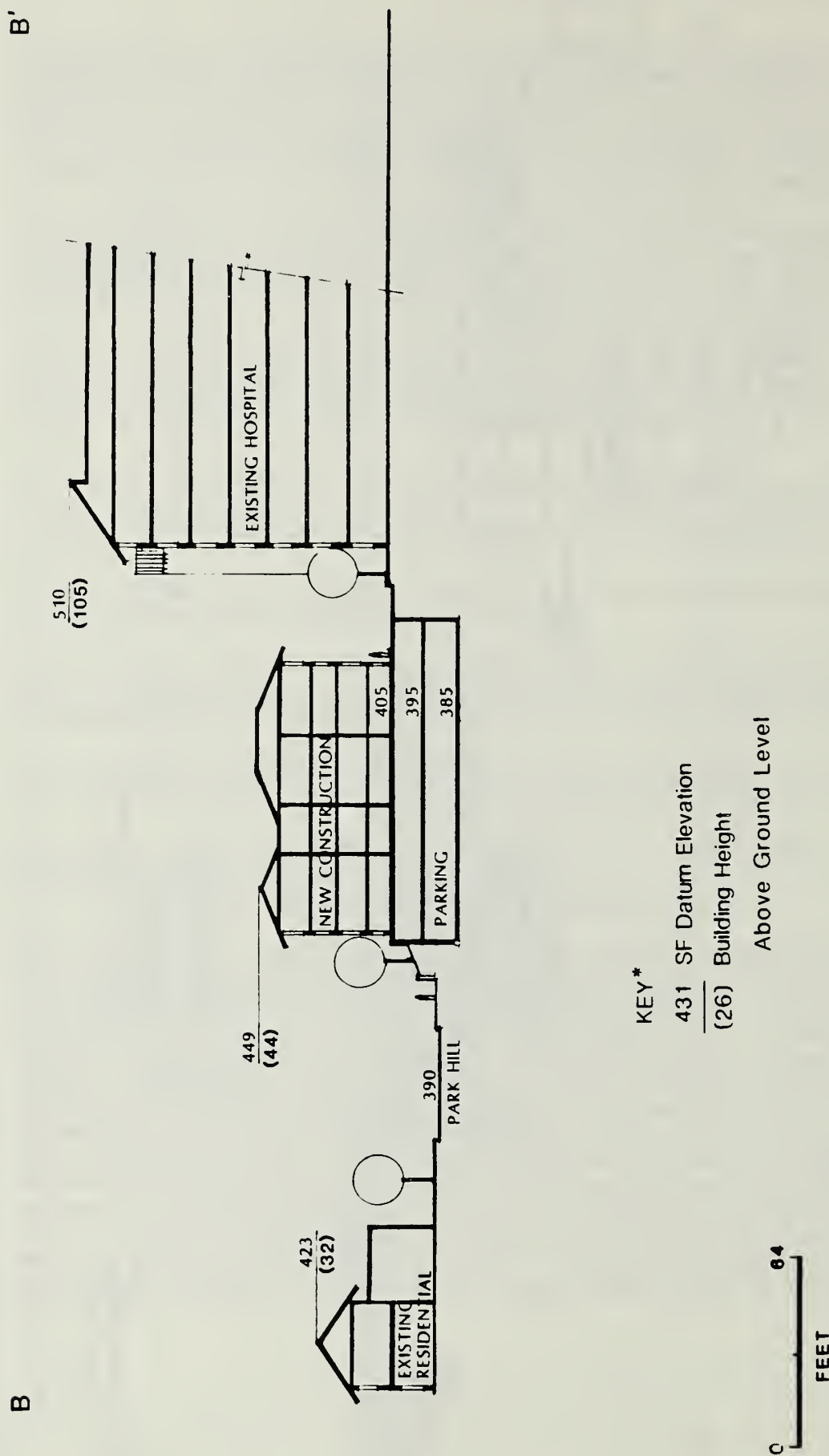
The site of the new construction is located within the 50-X Height and Bulk district. The maximum allowable height in this district is 50 ft.; no bulk limits apply. Along Park Hill Ave. curbside elevations range from 371 to 387 opposite the site of the new construction. However, for sites that slope upward from the street, curbside elevations are not used for determining building heights, the closest part of the building within 10 ft. of the property line (section 102.11(c), City Planning Code). The height of the new construction at any other cross-section would be based on the existing ground elevation at each cross-section. At 10 ft. within the site, the existing ground elevation is 395 ft.; the proposed 405 ft. elevation shown in Figures 2, 8, and 8a would not be used to determine the heights of the new construction under the Section 102.11(c) of the City Planning Code. In addition, for structures which have pitched roofs, the building height is measured from the midpoint of the roof slope (section 260.2 of the City Planning Code). On this basis, the heights of the new construction, including the above-grade garage levels, would be within the height limit of 50 ft.



*(Refer to Cross Section Location on Figure 2)

FIGURE 8: East-West Site Section

SOURCE: Kaplan/McLaughlin/Diaz



* (Refer to Cross Section Location, Figure 2)

FIGURE 8a: East-Southeast Site Section

SOURCE: Kaplan/ McLaughlin/ Diaz

X. Summary of Comments and Responses

b. Site and Area Topography

COMMENT

"The site plan is missing contour lines and spot elevations so that steep slopes surrounding the buildings appear level." (CRD, p. 49 and Michael Immel)

"... I would like to make one last comment that hasn't been brought up yet, ... nowhere in this Environmental Impact Report is there even a map of the topography of this area." (Alex Gilbert Captanian)

RESPONSE

The Site Plan, Figure 2, p. 12 of the Draft EIR has been revised to show the topography of the project site (see p. 105).

"Figure 15 on p. 34 of the Draft EIR has been revised to indicate the topography of the area (see p. 104). A new Figure 14a has also been added to the EIR. Figure 14a shows the grades of streets in the project vicinity (see Section 6. TRAFFIC HAZARDS, p. 149).

c. Loading and Service Access

"Also omitted is the space for on-site loading for delivery and service vehicles, that, when located on the plan, will further reduce site open space." (CRD, p. 49 and Michael Immel)

p. 55 -- Freight loading space [is] badly needed or there will be even more congestion on BVE [Buena Vista Ave. East]. Please include it in final EIR showing its exact location in relation to the exact locations of the two garage entrances on a map." (CRD, pp. 60-61)

"Multiple trash bins in place of single units ... " for trash recycling are mentioned on page 5 of the Draft EIR. Please explain how these units work in each apartment as well as in the total project. Is there a collection site? Are there pick-ups? If so, how and where?" (CRD, p. 51, and Michael Immel)

RESPONSE

A site plan showing the locations of freight loading and service areas in relationship to the driveway entrances has been added to the EIR as Figure 11a (see p. 106) As stated in the second paragraph on p. 55 of the Draft EIR, no central off-street freight loading area has been designed for the site. To describe freight loading and service access, the paragraph below has been added after the third paragraph on p. 17 of the EIR.

"All loading and service access would be from Buena Vista Ave. East (see Figure 11a). Garbage collection would occur at the existing driveway at the northeast corner of the existing hospital building. The trash collection area would be located under the canopy which encloses the former emergency vehicle entrance to the hospital. Deliveries and moving of household goods would occur at the main hospital entrance on Buena Vista Ave. East or within the interior driveway."

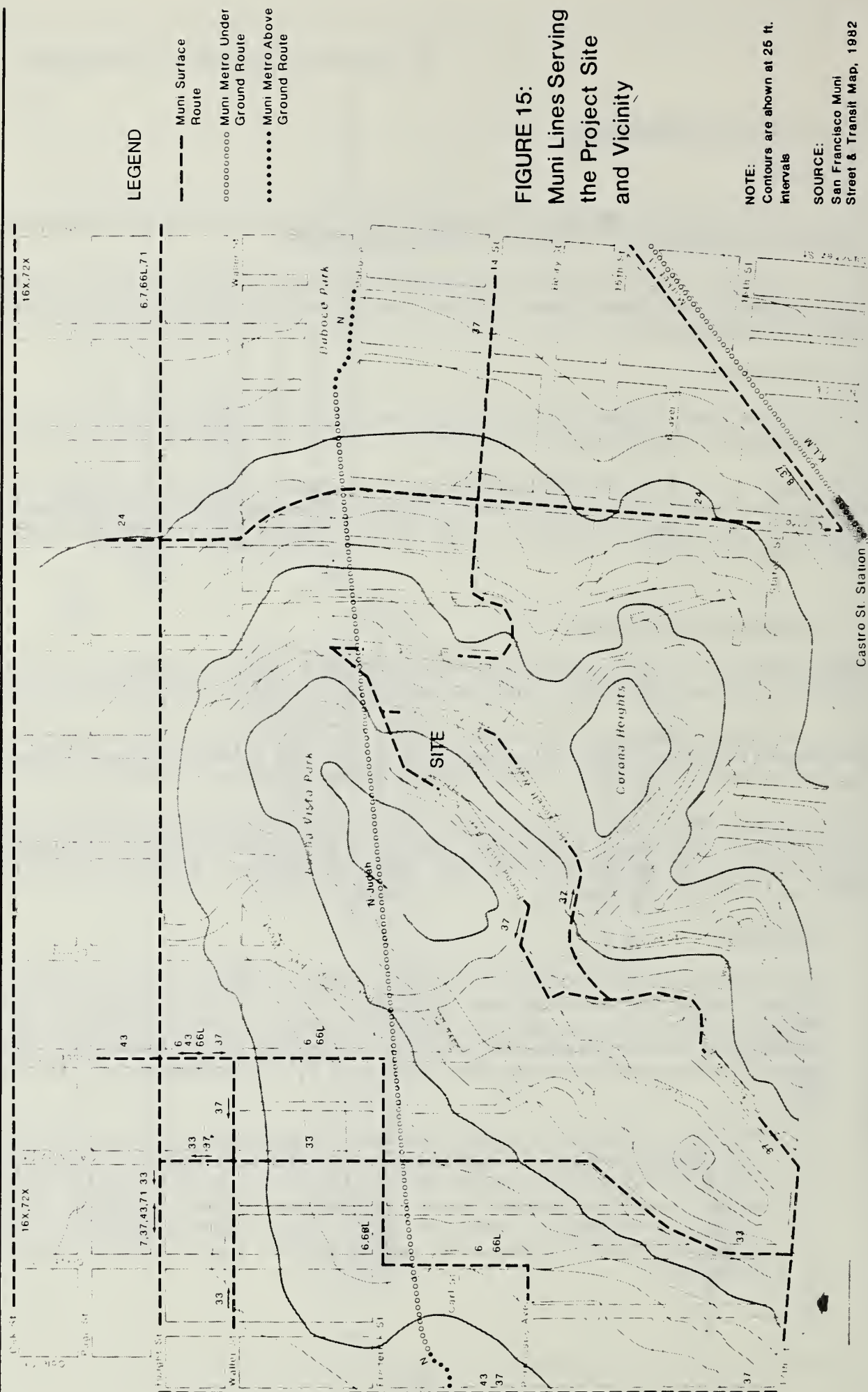
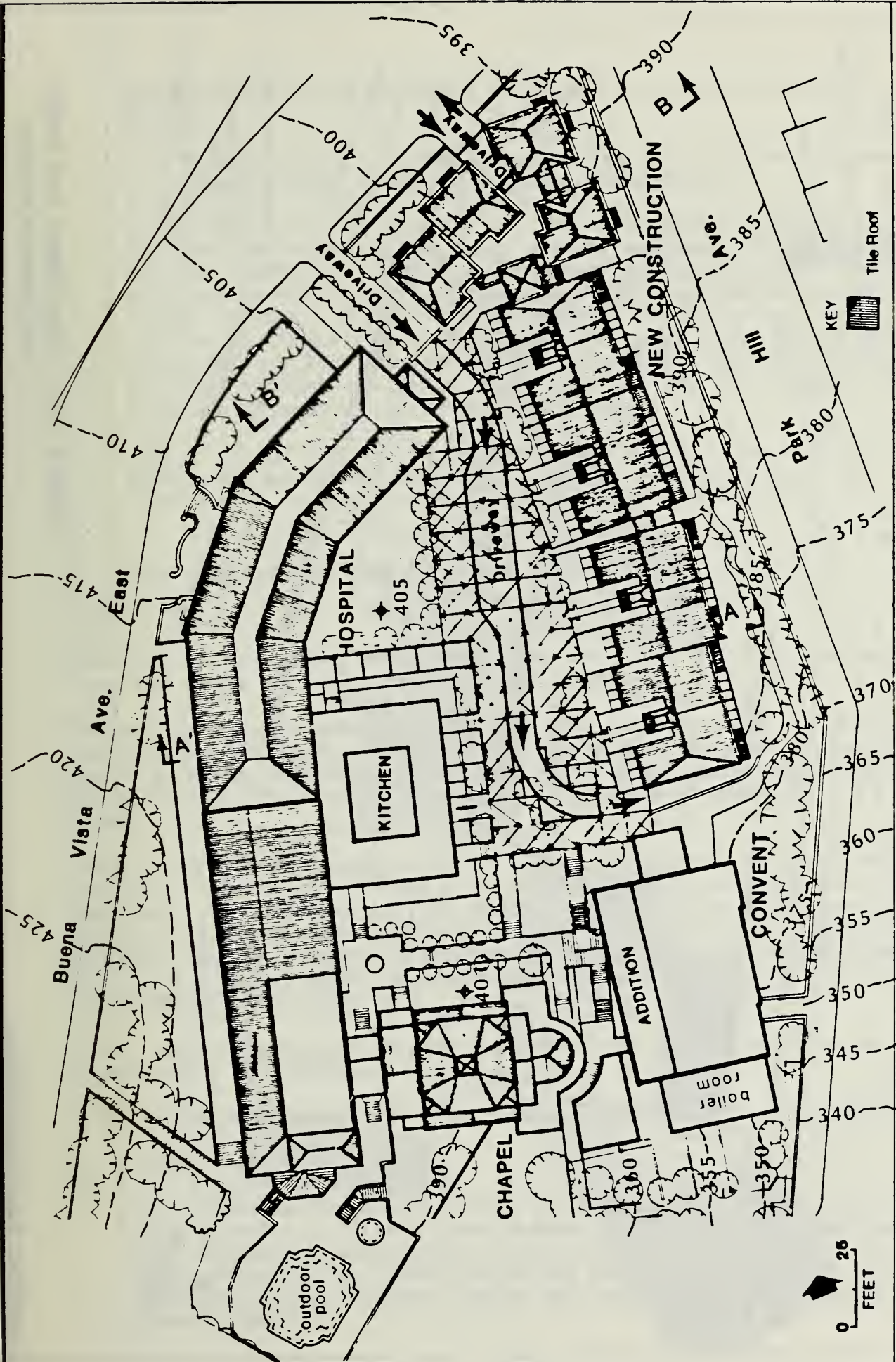


FIGURE 15:
Muni Lines Serving
the Project Site
and Vicinity

NOTE:
Contours are shown at 26 ft.
intervals

SOURCE:
San Francisco Muni
Street & Transit Map, 1982



A A' Approximate Location of Cross Section (Refer to Figure 8)

B B' Approximate Location of Cross Section (Refer to Figure 8a)

SOURCE: Kaplan/McLaughlin/Diaz

FIGURE 2: Site Plan

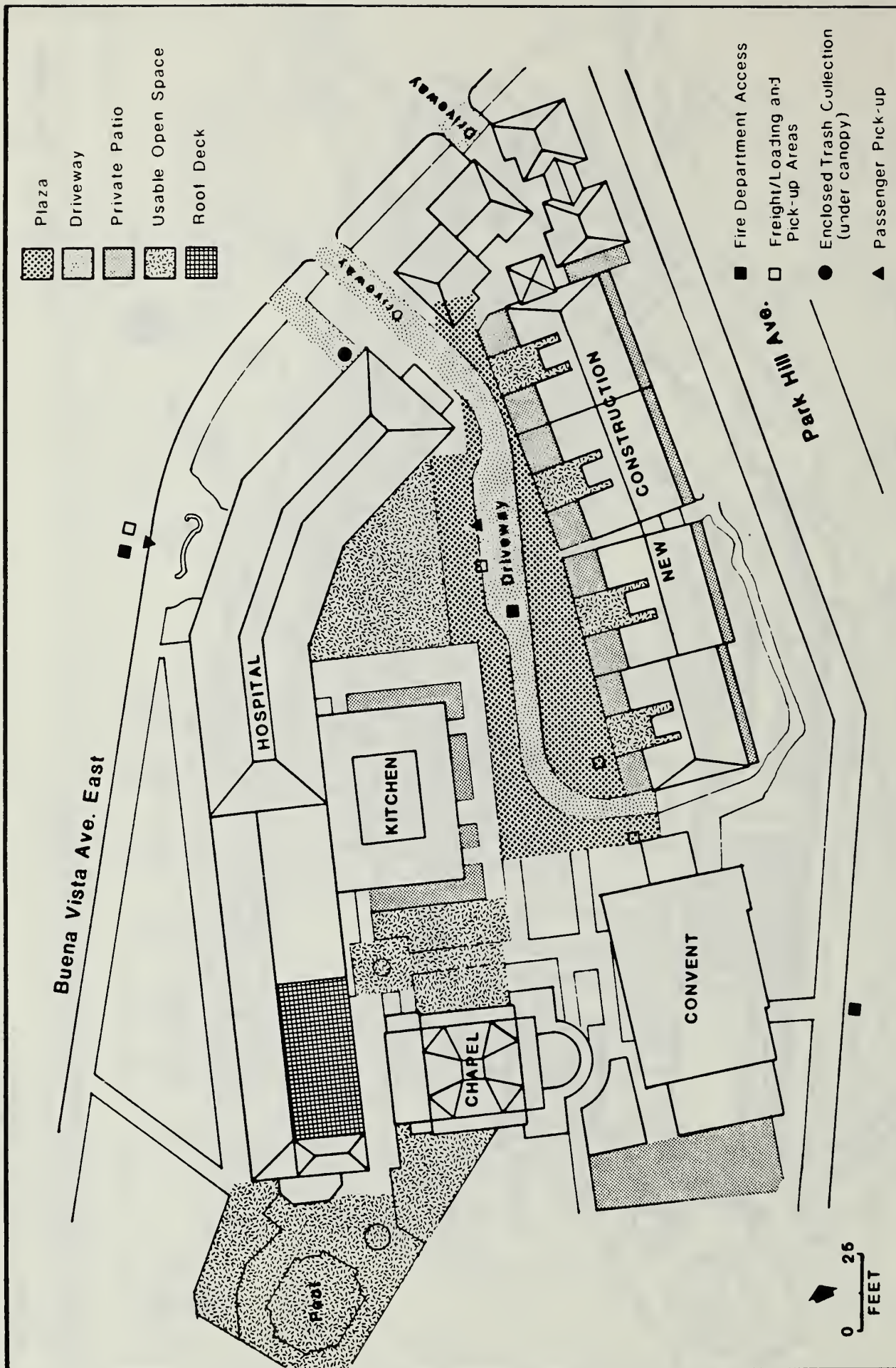


FIGURE 11a: Open Space and Freight and Service Access

SOURCE: Kaplan/McLaughlin/Diaz

X. Summary of Comments and Responses

The sentence below has been added to the end of the second paragraph on p. 55 of the EIR:

"Freight loading activities on Buena Vista Ave. East could cause traffic hazards if trucks double-park or impair lines-of-sight."

Multiple trash bins are separate bins that would permit separate disposal of recyclable materials such as cans, bottles, and paper from non-recyclable materials. These bins would be in addition to garbage dumpsters. The bins for recyclable materials would be enclosed under the canopy at the east end of the hospital building. Project residents probably would use bins for recyclable materials most often if they were located in the same area as garbage dumpsters. The project architect indicates that there is sufficient space to provide bins for recyclable materials and garbage dumpsters in this area (Leon Sugarman, Project Architect, personal communication, June 14, 1983).

Pick-up or delivery of the recyclable materials could be managed by the homeowners' association; these materials could be disposed of for a profit and therefore could decrease the homeowners' fees of project residents.

d. Landscaping and Open Space

COMMENTS

"Excavation will also threaten the mature trees along Park Hill. Any new construction should stay outside the drip line of these trees."

"Proposed extensive landscaping also threatens the existing mature tree masses. New trenches and plants beneath mature trees, and new watering regimes will shorten the life span of the large pine and palm along Park Hill. Existing plantings are not accurately depicted in either Fig. 2 or Fig. 3, pp. 12 and 13 respectively." (CRD, p. 51 and Michael Immel)

"Page 2, it talks about open space and has a figure, I think, or at least some estimate of open space. I think we need to have a very clear definition of what they are counting as open space. The courtyard they talk about is, as I understand it, a driveway to drop people off at that particular entrance. It's also a driveway to be used, I think, for emergency vehicles. And whether they are counting that as private open space, we should know. Then I think it is very unclear what else they are counting as open space. Or maybe I missed it. (Susan Bierman)

"p. 2 -- Identify open spaces on a map. How much open space would there be with fire engine access." (CRD, p. 58)

"p. 17 -- Please identify clearly on a map '10,000 sq. ft. open space'." (CRD, p. 59)

RESPONSE

The project sponsor intends to leave most of the mature trees untouched. One large cypress tree will be removed as shown on Figure 18, p. 44, Photomontage of New Construction Looking West from Park Hill Ave., and Figure 18a, p. 45, Photomontage of New Construction looking Northwest from Park Hill Ave. (Leon Sugarman, Project Architect, Kaplan McLaughlin Diaz, personal communication June 14, 1983.)

X. Summary of Comments and Responses

The following is added as a mitigation measure proposed as part of the project. It is added as the fifth measure in the Visual Quality and Shadows Subsection A, p. 70a.

"All feasible care would be taken to preserve the root structure of remaining trees during trench digging. In particular, the large pine and palm along Park Hill Ave. would be considered when plants and watering regimes are planned."

In the EIR, Figure 2, p. 12, Site Plan, and Figure 3, p. 13, Photograph of Project Model looking Northwest, are intended to show a conceptual image of tree plantings. The following note has been added to Figure 3:

"The placement of trees on the model is conceptual and does not represent actual heights or dimensions of existing or proposed trees on the project site."

The first two sentences in the last paragraph on p. 17 of the Draft EIR have been deleted. A new paragraph has been added to p. 23 after the second paragraph:

"The project would contain about 31,000 sq. ft of open space, plaza and driveway areas. This includes 8,160 sq. ft. of landscaping; 4,075 sq. ft. of recreational paved area (including the swimming pool); 6,225 sq. ft. of private patios; 4,810 sq. ft. of driveway area; 6,040 sq. ft. of plaza area; and the 1,665-sq.-ft. roof deck on top of the hospital building (see Figure 11a). The driveway and plaza area (10,850 sq. ft. would be used for emergency vehicle access, Fire Department maneuvering space and delivery areas). The open space described above does not include about 34,600 sq. ft. of walkways, stairs, and unusable (due to inaccessibility) landscaped areas."

The fourth full sentence on p. 2 of the EIR has been replaced with:

"A total of 20,100 sq. ft. of open space and recreation area would be provided, exclusive of about 10,850 sq. ft. that would be contained in the interior driveway and plaza."

e. Fire Equipment Access and Turnaround

COMMENT

"The incompleteness of the Draft EIR is most evident in the omission of a fire turn-around on site. When the 39 ft radius minimum turn-around is plotted (Appendix L), level open space on site disappears. What remains are very steep unusable slopes between buildings." (CRD, p. 49)

"p. 60 -- What happens to open space if turnaround for fire equipment is required? How does SFFD feel about not providing a turnaround?" (CRD, p. 61 and Michael Immel)

RESPONSE

On May 12, 1983, the project sponsor and architect met with Chief Edward Phipps of the San Francisco Fire Department. According to the project architect, Chief Phipps indicated that there would be sufficient site access and maneuvering space for fire equipment with the following provisions:

X. Summary of Comments and Responses

1. All new construction would be fire-sprinklered;
2. The driveways on Buena Vista Ave. East would be a minimum of 16 ft. wide;
3. The interior driveway would provide a 60 ft. maneuvering space (30 ft. radius); and
4. The sponsor would provide an Open Ways and Maintenance Agreement with the San Francisco Fire Department to assure Fire Department access onto the site.

The driveway and plaza area shown on Figure 11a does not have an adequate maneuvering area or turning radius for firefighting equipment. Adequate space could be provided by using about half of the open space area located west of the interior driveway (between the hospital and kitchen block). This area could still be used for open space but could not contain structures or be landscaped in a manner that would prevent access by firefighting equipment. The Fire Department indicates that with all of the stipulations stated above, the project would provide adequate access (Edward Phipps, Assistant Chief, Support Services, San Francisco Fire Department, letter, June 2, 1983 and telephone conversation, June 17, 1983).

An "Open Ways and Maintenance Agreement" would dedicate the interior driveway to the City of San Francisco. This would allow the Fire Department unobstructed access onto the site at all times, effectively prohibiting all parking and unattended loading in the interior driveway.

2. ZONING

COMMENTS

"... the Planning Code itself states very clearly, at section 303, that an application for a conditional use -- which is one of the privileges this developer is applying for -- must establish that "the proposed use or feature, at the size and density contemplated and at the proposed location, will provide a development that is necessary or desirable for and compatible with the neighborhood or the community." (Emphasis added.) See also Section 251, Planning Code." (CRD, pp. 6-7)

"The Department of City Planning study of May 5, 1975 indicates neighborhood concerns over the hospital's 'uncertain future.' Sanger's 1980 feasibility study listed neighborhood attitudes including the following: a 'desire to avoid a change in the neighborhood environment;' a 'concern regarding impacts on traffic and parking of any proposed housing use;' a preference for densities as low as possible to make housing use feasible.' (Sanger p. 19)

"At the neighborhood meeting last October 5th, one speaker summed up our feelings: '... the concern of everyone is the density of this thing is too much for this neighborhood. You are going to create another Telegraph Hill.' (Transcript p. 31)" (CRD, p. 8)

"... we do feel that the whole area will be changed by any large increase in the density of the area, which is all part of the environmental impact.

"... To saturate this hillside site in the midst of single-family homes and one-, two- and three-unit structures with such an enormous project would do great harm, not only to the immediate Buena Vista area, but to all the nearby neighborhoods as well. So, approval of such a development would fly in the face of long established planning principles." (Lee Gilbert)

-- The EIR should mention that RH-1 Zoning is located within 300 feet of the site. (CRD, p. 58)

". . . There was a general citywide campaign to try to solve some of these zoning issues that were cropping up all over the City. Out of this emerged the 1978 zoning, the new 1978 zoning ordinance under which these properties that are at issue here tonight were zoned RH-3 (sic)", [they were zoned RH-2]. (Dale Champion)

"Ever since 1973, the Buena Vista Neighborhood Association tried unsuccessfully on several occasions, including appeals to the Board of Supervisors, to have properties owned by St. Joseph's Hospital downzoned from the then existing zoning of R-4 to the current zoning, RH-2." (John Hooper)

"A Buena Vista Neighborhood Association notice dated Nov. 30, 1973, stated, "High density development continues to be a threat to the livability and pleasant character of our neighborhood. The majority of the area is zoned for two-family residential (R-2). There are, however, a few lots that are zoned R-4, multiple family residential or high-density. High density development of any of these lots would be very undesirable for the neighborhood . . . increasing density, noise, traffic, wider streets, etc."

That rezoning, sought by the neighborhood for the hospital site, was finally accomplished, as noted above, during the 1978 citywide residential rezoning process, which had as one of its stated objectives: "to protect the character of existing neighborhoods." That downzoning of the St. Joseph's Hospital site was a hardwon victory in which many local residents were involved. We look to the Planning Commission to respect and enforce its own decision which our neighborhood strongly supported." (CRD, p. 6 and John Hooper)

"One of our main concerns as a neighborhood association, ever since its formation, has been the issue of threatened significant increases in density that were out of harmony with our neighborhood. . . . One of the most important issues that we returned here to discuss on several occasions was the effort to downzone what was then classified as R-4, the hospital site and certain other surrounding, certain other abutting properties. We were highly concerned about what might happen if the hospital were to close and development were to occur in its place." (Dale Champion)

"As mentioned above, neighborhood concerns over rezoning of St. Joseph properties can be documented for at least the past decade and should be added to Appendix C (at p. 127 [250] EIR)." (CRD, p. 8)

"Then St. Joseph's . . . they want us to take away the only protection the neighborhood has against developers encroaching on them and change the zoning. They're supposed to increase the neighborhood density by 400 new residents, and they offer 200 parking spaces." (Janice Windborne)

RESPONSE

The City Planning Commission will decide if the project meets the criteria for a Conditional Use authorization as a Planned Unit Development (PUD) at the public hearing(s) on the Conditional Use and rezoning applications. As part of the Conditional Use application, the sponsor is required to demonstrate how the project would meet each one of the criteria required for a PUD. It is not the purpose of the EIR to establish such requirements.

X. Summary of Comments and Responses

The Draft EIR discusses the density of the project, as well as the effect of density on transportation, visual quality and the use of neighborhood parks. The City Planning Commission will consider the compatibility of the project to the Buena Vista and Greater Haight-Ashbury neighborhoods as part of its deliberations on the Conditional Use Application and zoning reclassification. See also responses in section 11. GROWTH INDUCEMENT, p. 172.

A 300-ft. radius around the project site extends roughly to Alpine Terrace on the east, Masonic Ave. and Roosevelt Way on the south, and the grounds of Buena Vista Park to the north and west. A RH-1 district is not located within this radius (see Figure 12, p. 25 of the Draft EIR). The closest RH-1 district is located about 800 ft. from the project site, southwest of Masonic Ave. along Loma Vista and Upper Terrace. A scale of 1 1/16 inches equals 1,000 ft. has been added to the legend on Figure 12.

Appendix C on pp. 250-251 of the Draft EIR summarizes issues raised at meetings held from October 1982 to February 1983 concerning the specific project proposal.

To address the zoning history of the site, the following has been added to p. 68a of the EIR after the third paragraph:

"Since 1973, residents of the Buena Vista neighborhood had sought to downzone the project site, the College of Nursing site, and several nearby vacant parcels owned by St. Joseph's Hospital (Lots 15, 16, 17, and 18) from R-4. In 1978, as a result of a citywide residential zoning study, the City Planning Commission reclassified these parcels to RH-2. /2/"

The following footnote has been added to p. 69b:

"/2/ Feasibility Study: St. Joseph's Hospital Site, November 24, 1980, prepared by John M. Sanger Associates notes that:

'The site was rezoned (from R-4 to RH-2) during the comprehensive residential rezoning of the city, in which most areas of the city were rezoned to correspond with the existing scale and density of development (p. 14, second paragraph). It is likely that the site was rezoned RH-2 in order to ensure substantial review prior to conversion to any other use and in order to ensure conditional use authorization for any change in institutional use (p. 18')."

See section 4. PARKING for a discussion of parking demand attributable to the proposed project.

3. CITY PLANNING POLICIES

a. Urban Design Element

COMMENTS

"The particular facet of the study that I will address involves its omission of any mention of existing City policy and planning guidelines which pertain either specifically to this very special area of San Francisco or would help establish some guiding principles to discuss this planning challenge in a context of prior City planning and sound land use planning." (John Hooper)

X. Summary of Comments and Responses

"This draft EIR ignores a whole storehouse of existing information and city policy concerning our neighborhood, which the developers would prefer to pretend did not exist. This is only one of many ways in which the document is self-serving and biased." (CRD, p. 7 and John Hooper)

"p. 145 -- All pertinent elements of SF Master Plan, City Planning Code and planning guidelines should be quoted in full." (CRD, p. 145)

"An accurate and complete EIR must, at a minimum, acknowledge the following information: . . . The Buena Vista neighborhood is one of five areas in the entire city described in the Urban Design Element of the San Francisco Master Plan as 'outstanding and unique' (p. 69, (sic)) [p. 27]. Yet the EIR omits any reference to the significant attention paid to this part of the City in the Urban Design Plan." (CRD, p. 2 and John Hooper)

"Some of the special characteristics of this area are described in the Urban Design Element as follows: . . . 'Exceptional variety produced by differences in street patterns across an uneven chain of hills, and a diverse mixture of building styles and roof types.' And, 'A finely scaled building pattern of small wall surfaces and pastel colors, with highly visible planting on steep slopes.' And, 'Houses of varied sizes and individual forms having interesting setbacks, cornices and bay windows, many of notable architectural quality.' The Urban Design Element of the San Francisco Master Plan states that it is the City's policy to protect such areas. (Conservation Policy #4 and #7, p. 67 (sic)) [p. 27, Special Characteristics of Outstanding and Unique Areas.]

"It further states: 'These (outstanding and unique) areas have an unusually fortunate relationship of building scale, landscaping, topography, and other attributes that make them indispensable to San Francisco's image. Threats to the character of these areas are sure to be met with intense concern by their own residents and by the public at large.' (p. 49 (sic)) [p. 17; emphasis added].

"The Urban Design Element goes on to state that one important issue it addressed in defining basic human needs and the qualities that make San Francisco a good place to live concerned major new development." (CRD, pp. 2-3 and John Hooper)

"The Urban Design Element concluded that one factor detracting from our quality of life is: 'Intrusion of new development which, through its visual dominance, height or excessive size, weakens or destroys important city or neighborhood qualities.' (p. 10)

"One of the Fundamental Principles for City Pattern is the following: 'Where large parks occur at tops of hills, lowrise buildings surrounding them will preserve views from the park and maintain visibility of the park from other areas of the city.' (p. 5, Principle #4) In effect, this means that the very existence of St. Joseph's Hospital violates one of the fundamentals of San Francisco planning (see also #14 at p. 31). The future planning challenge will be how to reduce its size - not expand it.

"The Urban Design Element goes on to talk about the 'special character worthy of preservation' of the Buena Vista area, specifically alluding to houses on Buena [Vista] Avenue East. This area is clearly identified as one with a character the city is committed through the Urban Design Plan to protecting." (CRD, p. 3 and John Hooper)

X. Summary of Comments and Responses

RESPONSE

The following is added to the Visual Quality and Shadows section after the first paragraph on p. 29 of the EIR.

"URBAN DESIGN POLICIES

"The Urban Design Element of the San Francisco Master Plan characterizes the Buena Vista neighborhood as one of five areas in the city that are outstanding and unique (p. 26). The Urban Design Element on p. 27, describes the Buena Vista and Upper Market neighborhood as an area with

- 'Exceptional variety produced by differences in street patterns across an uneven chain of hills, and a diverse mixture of building styles and roof types;'
- 'A finely scaled building pattern of small wall surfaces and pastel colors, with highly visible plantings on steep slopes;'
- 'Hilltop parks easily seen from below, with excellent views of the City from a central location.' and
- 'Houses of varied sizes and individual forms having interesting setbacks, cornices and bay windows, many of notable architectural quality.' (p. 27)

"The Urban Design Element further states on p. 17:

'These (outstanding and unique) areas have an unusually fortunate relationship of building scale, landscaping, topography and other attributes that make them indispensable to San Francisco's image. Threats to the character of these areas are sure to be met with intense concern by their own residents and by the public at large',

"Principle No. 4 for City Pattern states:

'Where large parks occur at tops of hills, lowrise buildings surrounding them will preserve views from the park and maintain visibility of the park from other areas of the City. Objective 1, Policy 14 states: 'Highly visible open space presents a refreshing contrast to extensive urban development.'

By its height and prominent hillside location, the existing hospital complex limits views of the lower southern slopes of Buena Vista Park as well as views of the City from Buena Vista Park."

b. Residence Element

COMMENTS

"The EIR fails to cite important sections of the Residence Element of the City Master Plan which have direct applicability to a balanced evaluation of the environmental impacts of converting St. Joseph's Hospital into residential use. Again, the EIR only cites City policy where such citations are clearly beneficial to the developer's case (e.g., see EIR pp. 37, 41).

X. Summary of Comments and Responses

"Objective 2 (New Residential Development) of the Residence Plan states: 'Encourage New Residential Development Only When It Preserves or Improves the Quality of Life for Residents of the City and Provides Needed Housing Opportunities.' It goes on to state: 'The growth issue centers on how to accommodate new residential development without jeopardizing the very assets that make living in San Francisco desirable,' (p. 9; emphasis added).

"Policy 1 of Objective 2 (above) states: 'In existing residential neighborhoods, ensure that new housing relates well to the character and scale of surrounding buildings and does not reduce neighborhood livability.' (Emphasis added) It continues: 'New development should reflect the predominant intensity level of the neighborhood. The lot pattern and building bulk should relate to surrounding properties, and the potential number of residents and the amount of activity generated should not overcrowd the area. (p. 10 Residence Element).'" (CRD, p. 4 and John Hooper)

RESPONSE

Policies and objectives cited in the comment above refer to the December 1975 Residence Element. That document has been superseded by the April 14, 1983 Residence Element. The discussion below refers to the 1983 Residence Element.

The following paragraphs are inserted as a new discussion at the end of the Growth Inducement section on pp. 69-69b of the EIR. These will be included in a new section, HOUSING.

"HOUSING

"Several policies of the Residence Element pertain to the proposed project (April, 1983). These include:

'Objective 1, Policy 4, Encourage infill housing on appropriate sites in established neighborhoods.

'Objective 2, Policy 1; Set allowable densities in established residential areas at levels which will maintain neighborhood scale and character;

"Other relevant policies are Objective 5, Policy 3, which discusses inclusion of low and moderate income units in new housing development and Objective 7, Policy 2 and Policy 3 which encourage access for disabled residents and the availability of housing for groups with special housing needs.

"Other applicable policies include:

'Objective 6, Policy 4: Promote development of well designed housing.' This policy refers to the scale, design character, and set backs of new housing.

'Objective 7, Policy 4: Eliminate discrimination against households with children.

'Objective 7, Policy 5: Encourage economic integration in housing.

'Objective 7, Policy 6: Provide adequate rental housing opportunities.'

X. Summary of Comments and Responses

"The project would not be responsive to Objective 7 as quoted, it pertains to design as it would not provide rental units. Several units in the hospital building could be entered from street level with elevator access to upper floors. This would allow the opportunity for access to the project by disabled persons. No low or moderate income units are currently proposed, therefore the project would not address Objective 5. The project would include 25 two-bedroom units which would provide an opportunity for people with children to live at the site (see also Alternative C for a discussion of a project alternative that could provide units for elderly residents).

"The proposed project would result in a higher density level of development than exists in the adjacent neighborhood. The scale and density of the project cannot be strictly compared to the adjacent neighborhood, as the project would convert the existing hospital buildings, which already have a more intense scale, into residential units."

c. Environmental Protection Element

COMMENT

"The Environmental Protection Element of the City Master Plan also contains policy guidelines which relate to evaluating the environmental impact of the project. Again, any reference to this useful document is omitted. Objective No.1 states: 'Reduce transportation-related noise' (p. 13). Policy 6 states: 'Discourage changes on streets which will result in greater traffic noise in noise-sensitive areas.' Objective 2 states: 'Minimize the impact of noise on affected areas,' (p. 14). The EIR makes no attempt to acknowledge these policies." (CRD, p. 4)

RESPONSE

Potential noise effects of the project were examined in the Final Initial Study (see noise discussion on pp. 234-235 of the EIR). As a result of the findings of the Final Initial Study, noise effects were determined to be insignificant and no further discussion was required. See also a discussion of noise effects in 4. TRAFFIC, e. Construction Effects, p. 126 of this document.

d. Transportation Element

COMMENT

The draft EIR fails to mention pertinent portions of the Transportation Element of the Master Plan. Policy 1 of the city-wide parking plan states: "Relate off-street parking requirements in new housing to expected vehicle ownership." (CRD, pp. 4-5)

RESPONSE

The following sentence is added as the first paragraph under the heading Parking Supply/Occupancy on p. 32 of the EIR.

X. Summary of Comments and Responses

"Objective 3, Policy 1 of the Citywide Parking Plan states: 'Regulate off-street parking in new housing so as to guarantee needed spaces without requiring excesses. Encourage low auto ownership in neighborhoods that are well served by transit and are convenient to neighborhood shopping.'"

e. Other Related Plans

COMMENTS

"Other important documents exist which should have been cited in the EIR. On May 5, 1975, for example, the Department of City Planning published a background report for the residential rezoning study covering this area. It found that 'streets are often narrow and steep, thereby creating additional traffic problems.' It acknowledged also that 'the uncertain future of St. Joseph's Hospital' was of concern to neighborhood residents." (CRD, p. 5 and John Hooper)

". . . when Sanger Associates did its November 24, 1980 'Feasibility Study: St. Joseph's Hospital Site,' they noted several important points:

1. 'The site has access and topographical constraints (p. iii)." (CRD, p. 5 and John Hooper)
2. 'The site was rezoned (from R-4 to RH-2) during the comprehensive residential rezoning of the city in which most areas of the city were rezoned to correspond with the existing scale and density of development, (p. 14).
3. 'Neighborhood groups have generally opposed higher densities on sites which have become available for housing.
4. 'It is certain that ultimate decisions would depend in part on neighborhood reactions.' (CRD, p. 5)

"All of this is important information to understand the context of this proposal, and yet it is totally ignored and omitted by the draft EIR." (CRD, p. 5 and John Hooper)

RESPONSE

The sentence below is added to the end of the fourth paragraph on p. 31 of the EIR.

"In 1975, The Department of City Planning prepared a background report on neighborhood rezoning in the Buena Vista area. That study indicates that 'streets are often narrow and steep, thereby creating additional traffic problems.' A feasibility report prepared for the site by John M. Sanger Associates also indicates that 'the site has access and topographical constraints which make it less suitable for elderly occupants'."

See also p. 111, section 2. ZONING for a response that addresses the John M. Sanger discussion of rezoning the site.

4. TRAFFIC

a. Trip Generation

COMMENT

"Vehicle Trip Generation: The methodology used in the draft EIR to determine the number of vehicle trips or p.m. peak hour vehicle trips that would be generated by the proposed project is grossly imprecise.

"The draft EIR stated that the proposed project would generate 60 vehicle trip ends during the p.m. peak hours, 600 vehicle trip ends per weekday or 140 person trip ends during the p.m. peak or put still another way, 1400 vehicle person trip ends per day (p. 54 and p. 3).

"These conjectural statistics were all arrived at using a traffic study at the Lake Merced complex as a base.

"A more logical approach to determine peak hour traffic would be to draw on Census figures for the St. Joseph's area, facts which we already know about the area and the project.

"The draft EIR estimates the population of the proposed project as ranging from 300 to 350 residents. Census figures for Tract #170 show that 70 percent of all tract residents work. Seventy percent of 350 is 235 workers. Multiply this by 55 percent (for the percentage of workers who go by car) and you get 129 vehicle person trip ends during the p.m. peak traffic hours. Divide by 1.3 (average number of persons in each vehicle) and you get the number of p.m. peak vehicle trips - 99. Multiply this by 10 (the EIR cites the Lake Merced study as showing that 10 percent of the total number of weekday vehicle trips is generated during the peak p.m. hours) and you get 990 vehicle trip ends per weekday - 60 percent more than the EIR stated.

"Factored for 300 residents, the findings show there would be 89 vehicle trip ends during the p.m. peak, 890 vehicle trip ends per weekday, 116 vehicle person trips during the p.m. peak or 1160 vehicle person trip ends per day -- again, significantly more vehicle trip ends than the draft EIR suggests.

"Moreover, it should be noted that our methodology is not only more precise but also more consistent. One of the assumptions of the draft EIR is that there would be 1.27 or rounded off 1.3 persons in each vehicle. Vehicle ridership of 1.3 times 60 vehicle trip ends (EIR findings) does not equal 140 vehicle persons trip ends. (EIR p. 54)

"It should be noted that there was considerable uncertainty among writers of the draft EIR about how to determine the anticipated number of vehicle trips that would be generated by the proposed project.

"An earlier transportation study on the proposed project, issued last October (on file at the Planning Department Library), states, 'The units would be expected to generate about 1,100 vehicle trip ends per day (1,400 person trip ends), with about 110 trips during the p.m. peak hour between 4:00 and 6:00 p.m.' (p. 16).

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"In an April 19, 1983, telephone conversation with City Planning transportation expert Gail Bloom, she explained that these figures were reworked for the draft EIR because the vehicular use figures generated by the Lake Merced complex were too high to be directly correlated to the St. Joe's site. So, why even use the Lake Merced complex - a suburban development - as part of the equation?

"We want to stress that under the California Environmental Quality Act the EIR is supposed to anticipate a worst-case scenario. It is our belief that the vehicle traffic that could be generated by the proposed project might be significantly higher than the figures we have previously indicated, and EVEN HIGHER than the initial transportation study indicates."

"Among the factors which determine peak hour vehicle trip ends are the number of cars which might be owned by project residents and the number of residents who work.

"Because of the high cost of the proposed condominiums there is a high probability that most of the units will house two workers. Consider the following scenario:

"Suppose there are two workers in 160 of the 200 units. Then typical peak hour work trip travel for these units would involve about 300 workers, allowing for some vacation, sick days, etc.

"If auto occupancy is 1.3 and 55 percent commute by autos, then we have almost 43 autos used for every 100 workers - or about 125 autos for the 160 two-worker households. If the other 40 units have only one worker, another 15 or so cars would be used on a typical weekday - or a TOTAL OF 140 VEHICLES IN PEAK TRAFFIC.

"In transportation jargon this amounts to: 140 p.m. peak hour vehicle trip ends, 182 p.m. peak hour vehicle person trip ends, 1400 weekday vehicle trip ends or 1820 vehicle person trip ends.

"This quite logical calculation clearly demonstrates that the amount of traffic that could be generated by the project is MORE THAN TWICE WHAT THE DRAFT EIR ESTIMATES AS A WORST CASE SCENARIO."

"Moreover, it does not take into consideration the certainty that the residents of this proposed project will have more cars than the tract average and therefore will be more likely to drive to work. So, these figures could still be even higher." (CRD, pp. 11-14)

"The Draft EIR states that there would be an estimated 60 vehicle trip ends during the p.m. peak, or 600 vehicle trips during the course of an average weekday. It is our contention, as you will see on Pages 11 through 14 of our critique, that these findings are grossly imprecise. Indeed, just using census information for this area, we found that there could easily be 990 vehicle trips daily, 60 percent more than the EIR stated. But this is a very conservative estimate. According to the California Environmental Quality Act, you were required to consider a worst case scenario. Let us look at what we fear is all too probable.

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"Because of the high cost of the proposed condos, there is a high probability that most of the units will house two workers. Suppose there are two workers in 160 of the 200 units, and one worker in the remaining 40 units. If auto occupancy is 1.3, and 55 percent commute by autos, then we end up with at least 140 vehicles in peak hour traffic, or 1400 weekday vehicle trips. This quite logical calculation clearly demonstrates that the amount of traffic that could be generated by the project is more than twice what the Draft EIR estimates as the worst case scenario." (Molly Hooper)

". . . there is a real lack of clarity of explanation in the section dealing with transportation, principally having to do with trip generation rates and so forth. And like lots of environmental documents, one has to collect information and facts, assumptions from appendices and footnotes, and some of it is even in the body.

"My basic comment would be that somewhere, and it could be in the appendix, an explanation of the assumptions that go into the transportation section be set forth with some clarity. I am just going to cite three examples of things that are unclear or perhaps just wrong.

"The first one. The trip generation rate as set forth in here is wrong as explained. I don't know if it is high or low, but it places a lot of emphasis upon assumptions about something called the Lake Merced Complex, with which I am not familiar, but there, it assumes that vehicle trip ends are, for example, 5.7 per day. They immediately translate that by multiplying it times the automobile occupancy rate into total trip ends and apply it to this project. Those are two different things . . . automobile trip ends, vehicle trip ends and total trip ends. And from that flows quite a few assumptions. . . . -- modal split information is not correct. Wrong, either high or low, depending on some of the other assumptions. The 55/45 assumptions regarding the use of automobiles, transit and other trips respectively is based on census information, which has to do with journey-to-work trips. And so, as a consequence, one cannot apply that, certainly, in this situation to total daily trip making.

"There is lack of clarity, if nothing more than just explanation about this assumption of ten percent peak hour use -- ten percent assumption of peak hour trips by any mode. In the explanation it talks about how this occurred -- in a footnote, rather -- how this occurs at, again, I think it is Lake Merced Complex, and says that is the peak hour trip making. Well, it then talks in terms of this project between the hours of 4:00 and 6:00. Many traffic engineering reports, they really mean peak hour. It isn't 4:00 to 5:00 or 5:00 to 6:00, it is that hour of the day when the most trips are taken. So this could be a translation of one-hour trip making to two-hour trip making and applying it to this project." (Douglas Wright)

RESPONSE

The study of the Lake Merced complex (on Lake Merced Blvd. south of Brotherhood Way) by Caltrans produced a daily vehicular trip generation factor (of 5.7 per unit) which was midrange among the factors found by Caltrans for several other such complexes in the Bay Area. The variance in trip generation per unit among the studied complexes was small. More than half the studied complexes generated daily trips per unit within 15% of the average for all the complexes. This suggests that trip generation on a per-unit basis is a reliable method of prediction of traffic impacts.

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The number of occupants of the project was projected in the Draft EIR on a per-unit basis. Subsequent computation of trips on a per-person basis does not remove the dependence of the estimates on the number of units, and does not enhance the accuracy of the estimates.

The cited figure of 140 person-trip-ends during the p.m. peak hour pertains to trips on any and all modes, and not just to travel by auto which would comprise 55% of the total or about 75 person trips by auto. When person-trips by auto is divided by an average occupancy of 1.3, this results in an estimated 60 vehicles per hour. (A vehicle trip is a trip by a vehicle whereas a person trip by auto is a trip by a person in an auto.)

The previous Transportation Study was prepared in October 1982. At that time, the 1980 U.S. Census information on the proposed project area was not available. Instead, a daily vehicular trip-generation factor was adopted which was judged to be conservative (overestimated) because it did not reflect the potential for transit use which exists at the project site.

It is valid to derive a person trip per unit figure from the Lake Merced complex and apply it to the project because the person trip rate would be expected to be comparable even though the modal split may not be comparable. The methodology started with vehicle trips because no survey of person trips exists for a Bay Area complex similar to the project. The vehicle trip generation factor was taken from a recent study by Caltrans at a Lake Merced condominium complex as discussed on p. 253 of the Draft EIR. The Lake Merced complex is suburban (as are all of the locations studied by Caltrans) with little or no access to transit. Thus, it was assumed that all of the travel from the Lake Merced complex occurred in automobiles. Therefore, this data was converted into person-trip generation rates by multiplying vehicle trip generation rates by persons per vehicle (automobile occupancy). The Census Bureau data provided a current basis for assigning the person trips to the probable mode of travel (auto, transit, etc.) for the estimates of vehicular and transit travel in the Draft EIR.

All working residents of the project would not commute during the same p.m. peak hour. As used in the EIR, the p.m. "peak" hour is that 60-minute interval of time during the evening in which traffic is greatest. The peak hour for residential uses typically occurs at some time between 4:00 and 6:00 p.m. For example, the peak hour could be 4:30 to 5:30 p.m. Some workers would return home at off-peak-hour times; thus the actual peak-hour travel would be less than that estimated by the commenter (Molly Hooper). This would bring the commenter's estimate in accord with the one used in the Draft EIR.

The estimates presented in the Draft EIR are not described as pertaining to a worst-case scenario. Such language would suggest incorrectly that the project's real impacts would almost certainly be less. In fact, the Draft EIR presents a best estimate of the actual impacts. This approach is the common practice of transportation analysts in the assessment of impacts of proposed residential developments.

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An alternative estimate of transit use would be made by assuming that 50% of the peak-hour trips are from work to home and that 40% of these are on public transit, and that 15% of the remaining non-work trips are made on transit. There would then be a total of 27.5% of the peak-hour person trips on transit. Such a revised estimate would lead to 40 peak-hour person-trips on transit and 95 person trips in 75 autos. Both these revised estimates and the estimates presented alone, of 55 person trips on transit and 75 person trips in 60 autos, are in the range of probable outcomes of the project's effects. The revised estimates do not lead to projected impacts of greater significance.

b. Modal Shares or Splits

COMMENT

"THE DRAFT EIR FAILS TO STATE THAT U.S. CENSUS FIGURES ONLY REFLECT HOW PEOPLE GET TO WORK AND DOES NOT INCLUDE NON-WORK RELATED MODES OF TRAVEL"

"A 1981 Metropolitan Transportation Commission travel survey on transit modal shares by travellers in San Francisco reveals that 39.3 percent of all San Franciscans use public transportation to get to work (comparable to the 40 percent figure for the hospital Census tract). This figure falls to 16.1 percent for shopping and 14.3 percent for social/recreational trips, indicating that cars are preferred for other than work related trips.

"It is well known among transportation experts that the rate of transit use drops even more among high income groups - to as low as one percent for non-work related trips.

"These statistics, along with the fact that the hospital complex is situated on a steep hill, some distance from the Haight Street commercial area, suggests that project residents will drive to use restaurants, shops and supermarkets in the already congested Haight Street district." (CRD, p. 15)

RESPONSE

The Draft EIR principally compares estimated peak-hour traffic of the project to existing peak-hour traffic conditions. The p.m. peak-hour traffic associated with residential developments is typically 65% inbound and 35% outbound, a disparity which is the result of the fact that more than half of the trips are from work-to-home. Assuming that 50% of the peak-hour trips would be from work-to-home and 40% of these trips would be on public transit, and assuming that 15% of the remaining non-work trips are made on transit, there would be a total of 27.5% of the peak-hour person trips on transit. In San Francisco, statistics show that upper income groups ride transit as much as other groups who own automobiles. Residence proximity to destination and parking availability are bigger factors in modal choice than is income.

This estimate is to be compared with the 40% factor used in the Draft EIR, which resulted in an estimate of project peak-hour travel of 60 persons on transit and 75 person-trips in 60 autos. Revision of these estimates to show 27.5% travel on transit would result in 40 peak-hour person-trips on transit and 95 person trips in 75 autos. Conclusions contained in the Draft EIR concerning the potential impacts of the estimated 60 auto trips would not be substantially different were the number to

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be revised to 75 auto trips. Both estimates are in the range of probable outcomes of the project's effects. The text of the DEIR has been revised to include these alternative estimates. The following has been added to the end of first paragraph on p. 54 of the EIR:

"On the assumption that fewer project residents would use transit for shopping, recreational and social trips, the percentage of transit ridership would be about 27.5%. This would result in approximately 95 peak-hour person trips in 75 automobiles."

c. Roadway Capacity

COMMENT

"Street capacity is determined by many variables, including street gradients, widths, surfacing, alignments, conditions along street edges, vehicle types, speeds, traffic controls and the skill of the driver.

"Traffic statistics are not generated on unique topographies like that in the Buena Vista neighborhood. The appropriateness of model statistics in the Draft EIR is doubtful - if irrelevant to the actual streets in the neighborhood.

"Residents know streets and driving and parking conditions better than traffic engineers who have only visited the site for a few hours." (CRD, p. 18)

"A congested roadway in a residential area is defined as 200 to 300 cars per hour. (Livable Streets, Donald Appleyard, U.C. Berkeley Press, 1981). But this statistic is not based on the peculiarities of the street alignments and gradients of Buena Vista hill. Its reference point is the grid with straight streets as 90 degree intersections - hardly our case.

"Already the peak hour traffic on Buena Vista East is about 200 vehicles, according to the draft EIR (p. 31). The proposed project could add, as we have shown, up to 140 more cars during this time period. The result would be a traffic nightmare with cars obliged to drive around Buena Vista Park as if it were a slalom course." (CRD, p. 20 and Molly Hooper)

"p. 54 -- Please identify precisely and then evaluate 'several eastern routes from the site'.

"-- Explain how volume would remain light in relation to capacity. What is capacity? Please set forth your methodology and conclusions. A footnote referring to a general study is not acceptable." (CRD, p. 60)

". . . on page 54, it shows the effects of traffic. Well, I live on the corner of Castro and 14th Street, one of the main arteries up to the proposal (proposed) project. And I would suggest to whoever did the traffic study, that they come on [up] there on a Friday afternoon and see the congestion up there." (Richard Rothman)

RESPONSE

The principal determinant of roadway capacity is the number of traffic lanes. The factors cited by the commenter influence roadway capacity; if they were to revise the two-way capacity of a two-lane roadway under ideal conditions (2,000 vehicles per hour) downward by 50% (to 1,000 vehicles per hour) for a roadway such as

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Buena Vista Avenue East, then the Avenue would still be estimated to be operating at only about 1/5th of capacity with peak-hour traffic (200-215 vehicles per hour). Buena Vista Ave. functions as a residential collector street, carrying traffic volumes from intersecting residential streets such as Park Hill Ave., Buena Vista Terrace, and Upper Terrace. Peak-hour traffic volumes on these latter streets are much less than the volumes on Buena Vista Ave.

See comments and responses in section 5.a. above regarding project trip generation.

The Appleyard capacity is equivalent to between 2,000 and 3,000 vehicles per day; 4,000 vehicles per day is viewed as an upper bound for liveable capacity on residential streets, whereas functional capacity would be about 10,000 vehicles per day. The Appleyard capacity is based on research conducted on neighborhood residents, to determine the residents' perceptions of usable street space and neighborhood identity. Appleyard found that traffic volumes of greater than 300 - 400 vehicles per hour had the effect of creating a barrier between two sides of a street and thus reducing neighborhood identity. The paragraph below has been added to p. 54a of the EIR, after the last paragraph:

"The late Donald Appleyard conducted a study of traffic capacity on neighborhood streets (Liveable Streets, Berkeley Press, 1981). That study found that traffic volumes of greater than 300 to 400 vehicles per hour had the effect of creating a barrier between two sides of a street, thus reducing neighborhood identity. Projected volumes on Buena Vista Ave. would not exceed 300 vehicles per hour at any time of the day, were the proposed project to be completed. This analysis of volume does not take into account the functional capacity of a roadway. It is not possible to predict volumes on other streets where project generated traffic would be dispersed."

Higher speeds also contributed to this effect. Thus the Appleyard capacity does not address functional capacity, nor does the fact that the research was conducted on a planar grid street system have bearing on the Buena Vista Neighborhood as the Appleyard capacity is basically a perception of traffic as a barrier to social activity. The absolute volume is important, not the street system, because there is no relation to functional capacity.

As noted on p. 30 of the Draft EIR, 14th and 15th Sts. and Duboce Ave. run east-west and connect the site with Castro St. and with Market St., and Buena Vista Avenue East provides access via Baker St. to Oak and Fell Sts., which are a one-way, east-west pair of major thoroughfares. As noted on p. 54-54a of the Draft EIR, project-generated traffic would be dispersed on these and other of the various routes into and out of the neighborhood; it is not possible reliably to predict the volumes on each of the streets. However, as also noted, the increase on any one street would not be enough to cause a noticeable increase in delays at intersections in the project vicinity. Nor would there be a noticeable increase in delay at intersections on Haight St., Castro St., Fourteenth St., or Roosevelt Way.

d. College of Nursing

COMMENT

"The draft EIR states that about 10-15 p.m. peak hour vehicle trips would be expected from the bed and care facility (p. 61). This figure is based on a 1979 ITE trip generation study.

"ITE has never conducted a traffic survey for an intermediate care facility - a facility, which we understand, is intended for patients just out of the hospital who are not well enough to go immediately home but choose this bed and care facility as an alternative to staying in the hospital in order to save money.

"The ITE studies, which the draft EIR apparently refers to, do cover trip generation for nursing homes, facilities for the chronically ill and convalescent homes. We maintain that these institutions are not analogous to an intermediate care facility.

"An intermediate care facility is not an old age home nor a place where the chronically ill go to die. Instead, it is a place where people go to recuperate from a hospital stay. These patients will presumably be healthier than hospital patients and thereby more able to receive visitors.

"The draft EIR is comparing apples and oranges. It is our belief that the future facility will generate considerably more traffic than is presumed by the draft report." (CRD, p. 16 and Molly Hooper)

RESPONSE

As the commenter notes, there is an apparent lack of traffic survey information in "intermediate care facilities". Trip-generation studies on hospitals show a wide range of trip-generation factors on a per-bed basis, as do nursing-care facilities.

Were the actual trip generation twice as great as that used in the Draft EIR, then there would be up to 30 p.m. peak-hour vehicle trip ends at the bed and care facility. Were the estimate contained in the Draft EIR revised upward to 30 p.m. peak-hour vehicle trips, then there would be a total (with the proposed Park Hill project) of up to 105 new peak-hour vehicle trip ends added to Buena Vista Avenue East, replacing about 35 trips generated by existing uses of the two sites. Therefore the net increase in vehicular traffic on Buena Vista Avenue East would be 70 vehicles per hour, added to existing traffic of about 200 vehicles per hour. This overall 35% increase would be noticeable. It would not contribute significantly to travel delays encountered by existing drivers.

e. Construction Effects

COMMENT

"-- 15 month construction period needs justification." (CRD, p. 58)

"p. 60 Please explain footnote 3." (CRD, p. 61)

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"Home owners are also very concerned that older houses may be damaged by vibrations from heavy construction equipment. The neighborhood specifically asked that haul routes be identified (Hooper letter of 2/24/83). But the EIR determined that haul routes cannot be specified at this time.

"This is simply an attempt to hide the obvious fact that Buena Vista Avenue East is the only logical access route for construction vehicles (EIR pp. 52 and 54). The true environmental impacts along this route must be studied.

"Using the EIR's own figures -- that 13,000 cubic yards of material will be removed from the site in 30 days, we have determined that one dump truck will pass along Buena Vista Avenue East every four minutes during that period. (EIR pp. 52-53)." (CRD, p. 62)

"p. 71 -- Identify haul routes from Hospital site to dump site." (CRD, 62)

"And it is ironic to me that without consideration of the topography, how could this Environmental Impact Report conclude that the impacts of noise and pollution would be insignificant enough, so insignificant that they should not even be addressed? And I submit that if the conditions of the topography are studied relative to noise and pollution, I think it will be determined that specific study will reveal that the level of noise will be far in excess of those of other areas that have the same number of vehicle trips on level ground." (Alex Gilbert Captanian)

RESPONSE

Footnote /3/ referred to by the commenter is on p. 61 of the Draft EIR. The proposed construction would require 15 months. This is an estimate by the contractor of hours of labor required, based on the contractor's experience and judgment. Exact scheduling of work within the 15-month period has not been done at this preliminary stage of project planning, but a rough estimate of the peak number of workers on-site was required to estimate construction-worker travel demand and parking demand.

A single estimate, based on the assumption that the number of workers on-site would be constant throughout the 15-month construction period, would clearly underestimate the peak number of workers. Instead, a bell-shaped distribution of labor versus time was assumed; actual labor use at the site was assumed to start slowly, rise continuously to a peak value, and then decline steadily toward the end of the construction period. Specifically, it was assumed that two-thirds of the labor allocations would be expended during a ten-month period.

People are far more sensitive to vibration than the structures they occupy. The severity of vibration, induced into the ground and subsequently transmitted to a structure, is dependent on many variables. Residents of homes along the haul routes, may feel vibrations as a truck passes in front of their house. However vibrations induced into the ground by trucks should not cause structural damage to nearby houses. (See for example the report prepared by Earth Systems Consultants, for the City of Fremont, Fremont California, January 1983, Noise and Vibration Study, Fremont, California. This study contains several background discussions and references on the effects of noise and vibration on older residential structures.)

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As noted on pp. 52 and 53 of the Draft EIR, construction-vehicle access to the site would principally be from Buena Vista Avenue East, so that it is certain that segments of the Avenue would be on the principal construction haul routes.

At present, peak-hour traffic on the Avenue consists of about 200 vehicles, and there are essentially no heavy trucks or large vehicles among them except for four diesel coach trips on Muni's 37 Corbett line. The maximum daily truck traffic, as estimated by the building contractor, would be 35 round trips per day, or about 5 round trips per hour (10 trip ends per hour).

However, an estimate of one truck every four minutes is also within the range of possible outcomes, as construction scheduling and equipment allocations are at present preliminary.

This number of heavy truck trips would produce an estimated time-averaged noise level of 67 decibels during the peak hour at a distance of 50 feet from the traffic lane. Existing peak-hour traffic produces an estimated 57 decibels from autos. Buses in the 37 Corbett line add about 6 decibels, so that the existing noise level averaged over the peak hour is about 63 decibels. On streets in the project vicinity that have grades of 7% or more (see new Figure 14a, on p. 149 of this document), vehicle-generated noise levels would increase by five dBA (U.S. Department of Transportation, Federal Highway Administration, Highway Traffic Noise Prediction Model, FHWA-RD-77-108, p. I-1). This increase would be noticeable. The decibel unit used in this discussion is the A-weighted decibel, which preferentially measures frequencies most audible to humans. The estimates include an allowance of five decibels for steep grades encountered by cars as well as trucks and buses.

Noise and air quality effects of the project were determined to be insignificant in the Final Initial Study (see pp. 233-236 of the Draft EIR). On p. 234 of the Draft EIR, the Final Initial Study indicates that project-generated traffic would not increase exterior noise levels on any street segment in the project vicinity by more than one dBA with the exception of Roosevelt Way where traffic-related noise would be increased by four dBA, from 52 to 56 dBA. On grades exceeding 7%, project traffic would increase noise levels by six to nine dBA (an increase of 66 to 69 dBA). At a distance of 50 ft., these noise levels would be reduced. With windows open, interior noise levels would be reduced by 10-15 dBA. Closed windows would reduce noise levels by 15-20 dBA.

As discussed in the Final Initial Study on pp. 235-236 of the Draft EIR, roadside CO concentrations attributable to the project would be well within the standards of 35 ppm and 9 ppm, respectively, for 1-hour and 8-hour averages of CO.

f. Pedestrians

COMMENT

"Little if anything is said in the EIR regarding pedestrian traffic. It is obvious that the proposed project would attract many more people to the park. The pedestrian crossings in the area will be increasingly hazardous with greater traffic volume. Of particular note is the park entrance at Duboce. Cars coming up the hill on Buena Vista East are blind as they come around the bend - just where the pedestrian crossing is located." (CRD, p. 22)

"p. 33 -- Pedestrian use severely underestimated; also skateboarding and rollerskating on BVE. Lots of foot traffic to tennis courts, playground. EIR should note that there are numerous children in neighborhood, creating special pedestrian hazards." (CRD, p. 60)

"p. 41 -- Dangers to pedestrians will be increased by having all vehicular access to the site from BVE." (CRD, p. 60)

RESPONSE

As the Draft EIR notes in the last paragraph on p. 33, few pedestrians are to be found in the immediate site area during the p.m. peak (vehicular) traffic hour.

The 1980 U.S. Census indicates that about 6% of the 140 peak-hour person trips, or 8 trips, would be pedestrian or bicycle trips.

Vehicular traffic on Buena Vista Avenue East would be increased by about 13-20% by the project, and potential conflicts between vehicles and pedestrians in the Duboce St. crosswalk would increase accordingly.

The portion of the total population of Census Tract 170 that is under 18 years of age is 6%. (See also Section 14. HOUSING, b. Population per Household.) The playground areas nearest to the site are in Buena Vista Park, across Buena Vista Ave. East from the site, and the Peixotto Playground on 15th St. (see Figure 1), just south of Buena Vista Terrace. The greatest percentage increase in traffic attributable to the proposed residential project would be a 20% increase in the traffic on Buena Vista Ave. East. Pedestrian-vehicle conflicts in crosswalks across Buena Vista Ave. East would increase in accordance with increases in vehicular traffic.

The only possible points of access to the site are from Buena Vista Ave. East or from Park Hill Ave. The proposed garage entrance/exit on Buena Vista Ave. East would be about 50 feet from the intersection with Park Hill Avenue, so that access to Park Hill Ave. could be gained after only 50 feet of travel on Buena Vista Ave. East.

Park Hill Ave. has a segment which is steep (19% grade) and an intersection with Roosevelt Way at which vehicle-to-vehicle sight distance is somewhat restricted. The creation of additional curb cuts and garage driveways would decrease the potential for pedestrian-vehicle conflicts in any one driveway, but due to the increase in the number of driveways there would be no net improvement in safety for pedestrians on sidewalks.

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While a driveway entrance/exit on Park Hill Avenue might divert some traffic to Roosevelt Way from Buena Vista Avenue East, it is not necessarily the case that reducing some of the project-generated 15-20% increase in vehicular traffic on Buena Vista Avenue East, at the expense of increased traffic on Roosevelt Way, would enhance pedestrian safety.

g. Mitigation Measures

COMMENT

"THE DRAFT EIR FAILS TO SUGGEST ANY MEANS TO MITIGATE PEAK HOUR VEHICLE TRAFFIC"

"Among the points that might be considered are: construction of bus shelters on Haight Street to make bus travel, particularly during the rainy season, more attractive; and the distribution of information from RIDES to encourage carpooling." (CRD, p. 15 and Pauline A. Layer)

"Dispersal of traffic should be considered with garage entrances on different streets." (CRD, 60)

RESPONSE

The following Transportation mitigation measure has been added to p. 71 of the EIR as the first measure proposed as part of the project:

"- The project sponsor would make available to project residents a presentation by RIDES to encourage car pooling."

The following as a transportation mitigation measure which is not as yet included as part of the project, but which may be required by the Commission as a condition of project approval, has been added as the first measure under the heading "Measures not included as part of the project", p. 71 of the EIR:

"- The project sponsor could pay for the cost of installing a bus shelter on Haight St. or Buena Vista Ave. East."

Two garage entrances are proposed for Buena Vista Ave. East. The only other site frontage available for a parking garage entrance is Park Hill Ave. The steep grade, topography, and residential uses along Park Hill Avenue would make a garage entrance/exit on that street less suitable than one on Buena Vista Ave. East.

5. PARKING

a. Vehicle Ownership

COMMENTS

"Parking is a well recognized citywide problem in San Francisco. Parking problems affect our quality of life and the desirability of our neighborhoods."

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"The Buena Vista Neighborhood already suffers from a significant parking problem. However, in recent years this problem has been somewhat obscured by the fact that St. Joseph's Hospital and the adjacent College of Nursing on Buena Vista East have been essentially vacant.

"Because of the existing ease of parking directly in front of the hospital complex, one might assume that there is plenty of parking available on the street in the project area. But casual observation is deceptive. The prospect of having a 200-unit condominium development come into our neighborhood, providing only one off-street parking space per unit, is truly frightening.

"In critiquing the draft EIR we will show that the amount of parking demand that could be generated by the proposed development has been grossly underestimated as has the amount of existing demand by current neighborhood residents. . . .

"It is our contention that one parking space per unit is inadequate just for the proposed condo dwellers alone - not including visitors and service vehicles."

"The Comprehensive Plan for Transportation for the City and County of San Francisco states as its No. 1 policy, 'Relate off-street parking requirements in new housing to expected vehicle ownership.'

"Vehicle ownership was never adequately addressed in the draft EIR; the EIR fails to isolate parking demand by residents of the proposed project from that of residents and visitors.

"The report merely notes that parking demand attributable to the project would range from 200 to 270 spaces (p. 3) or it states that the project would generate on-street parking demand of 40 to 80 spaces at its peak (p. 59).

"CENSUS DATA INDICATES THAT CONDO DWELLERS ALONE WOULD HAVE MORE THAN ONE VEHICLE PER UNIT:

"The hospital site is located in U.S. Census Tract #170. Census figures for 1980, obtained from the Association of Bay Area Governments, show that there were at least 2036 vehicles (cars, vans, trucks) for 1893 households or a total population of 3316 in tract #170.

"That amounts to 1.076 cars per household (household size for the tract being 1.75 persons) or 215 cars for a 200-unit development.

"On a per capita basis, assuming a resident population of 350, that amounts to 213 cars or 183 cars for the "best case" scenario of only 300 residents. This assumes that the new residents have incomes similar to those now living in the area.

"MORE MONEY ... MORE CARS

"The EIR never examined the correlation between income and auto ownership. The 1980 Census clearly shows a correlation, that with more money people have more cars. Because condo dwellers will have a higher income than the tract average, they therefore will have more cars than the tract average.

"Buena Vista Park is rimmed by three distinct economic groups.

"Tract #167, bounded by Oak, Steiner, Duboce and Buena Vista East, has an average household size of 2.08 persons and a per capita income of \$8,271. Census figures show there are 0.81 cars per household.

"Tract #171, bounded by Buena Vista West, Upper Terrace and Waller, has an average household size of 2.04 persons, a per capita income of \$11,005 and an average of 1.04 vehicles per household.

"Tract #170, which contains the hospital site and is bounded by Buena Vista East, Duboce, Castro, 17th Street and Upper Terrace has - as previously described - an average household size of 1.75 persons, 1.076 cars per household and a per capita income of \$14,968.

"These tracts are almost identical in terms of access to public transportation and shopping. They do differ significantly, however, on the basis of income. With increased income comes a higher percentage of car ownership.

"It takes no great leap in logic to deduce from this that households in the proposed project will have more cars than the tract average.

"To qualify to make payments on an average 750-square-foot condominium, offered at \$200 a square foot, a household would have to have an annual income of about \$50,000 - twice the average household income in Tract #170.

"Simply put, people who buy condos don't usually ride the bus." (CRD, pp. 24-27).

"As far as other residential complexes surveyed, the authors of the EIR that we are discussing pointed out that, and I quote, 'Auto ownership can be related to family size and age, to number of family members employed outside of the home, and generally to income levels. As very little is known about the future residents of the potential Park Hill residential project, prediction of parking demand based on prediction of auto ownership of the potential residents would not be valid.'" (Alex Gilbert Captanian)

RESPONSE

See response to comments in section 3. CITY PLANNING POLICIES, d. Transportation Element, pp. 115-116.

Section 151 of the City Planning Code requires that one parking space per dwelling unit be provided for residential developments. The Code allows up to 1.5 spaces per unit as an assessor's use (Section 204.5). Provision of more than 1.5 spaces per unit would require a Conditional Use authorization.

The estimates of parking demand contained in the EIR are not limited to the demand for space by residents, but include the additional (and competing) demand attributable to visitors.

The use of Census data to predict parking demand for the project as presented in the comment above is not appropriate. First, an estimate of parking demand based solely on residents' auto ownership does not account for parking demand by visitors. Second, the major assumption in the use of Census data by the commenter is that the project residents would have at least as many vehicles per unit as the residents of Census Tract 170. However, the project would not have the same characteristics that are prevalent in Census Tract 170. The lack of specific information about residents of the proposed project made estimating parking demand by this method impossible; consequently, an alternate method of predicting parking demand was used.

X. Summary of Comments and Responses

The commenter states that project residents would not be similar to the residents of the Census tract, but suggests that the project residents would be similar enough to generate at least an auto ownership ratio per capita as high as that of the Census tract residents. Further, the commenter concludes that project residents must have a higher income than existing residents in order to afford to live in the project, and therefore project residents would also have more cars. This methodology is not supportable for several reasons. The Census tract in which the project is located contains predominantly single-family dwellings, ranging in size from 1,500 to 3,200 sq. ft. of floor area. The multi-unit nature of the project suggests a dissimilarity between project residents and neighborhood residents. As stated in the second paragraph on p. 260 of the Draft EIR:

"Parking demand at residential developments is a function of several variables, foremost of which is auto ownership by residents. Proximity to transit lines and the amount of visitor travel are also variables in demand. Auto ownership can be related to family size and age, to the number of family members employed outside of the home, and, generally, to income levels. As very little is known about the future residents of the Park Hill project, prediction of parking demand based on prediction of estimated auto ownership of the potential residents would not be valid."

If one applies to the project the automobile ownership per household numbers stated for Census Tract 167 (0.81 cars per household), Tract 171 (1.04 cars), and Tract 170, the project tract, (1.076 cars) the total cars per household (or unit) generated by the Park Hill project would range from 162 to 215. The high end of this range would fall within the range of parking demand estimated in the Draft EIR. The last paragraph on p. 56a of the Draft EIR states that parking demand for the project would range from between 200 to 270 spaces; this estimated range, unlike the car ownership data, takes into account estimated visitor demand.

b. Analogous Study Sites

COMMENTS

"THE DRAFT EIR FAILED TO COMPARE THE PROPOSED PARK HILL PROJECT WITH ANY ANALOGOUS SITE"

"Telegraph Landing and Diamond Heights were chosen as comparable developments, although in neither case is the neighborhood composition or the context in any way similar to St. Joseph's. (Incorporate by reference Feb. 9, 1983 Buena Vista Community Task Force Response to Parking Demand Study for the Conversion of St. Joseph's Hospital). Telegraph Landing is within walking distance of downtown, and Diamond Heights is quite isolated, with little competing parking (see Appendix B of the CRD).

"The surveys at Diamond Heights and Telegraph Landing left a lot to be desired. The survey never established how many cars are actually owned by residents in the two complexes. Subsequently, it is virtually impossible to determine the ratio of visitor cars to residents' cars using curbside parking.

"This could have been established by door-to-door surveys, postcard surveys or by a check of owner addresses from license plate registrations for all curbside parking.

"Because garage spaces have to be rented at Diamond Heights, we know that 364 parking spaces were spoken for. (No comparable information was supplied regarding Telegraph Landing.)

"On the two week days surveyed at Diamond Heights only 85 percent of the spaces were in use, a figure which dropped to 82 percent on the one weekend night surveyed. This suggests that for convenience sake at least 15 percent of all residents' cars that could have been in the garage are on the street. Translated to the proposed project at the St. Joe's site, 30 cars that might be in the garage would be parked on the street.

"The issue of curbside parking for convenience by condo dwellers should not be minimized. Many residents would prefer to park on the street rather than on the third level of a subterranean garage." (CRD, p. 28.)

"The traffic consultants, Wilbur Smith and Associates, had enough doubts about using Telegraph Landing as a study site that they operated on the premise that their observations there 'would not be used if the data proved to be completely dissimilar from the data collected at the other survey site.' (EIR p. 139 [262]).

"TWO ANALOGOUS SITES SURVEYED BY THE BUENA VISTA NEIGHBORHOOD ASSOCIATION"

"In another effort to deduce the impact of a proposed large, multi-unit residential building in our neighborhood, we independently took an inventory of the number of cars owned by residents of the two largest apartment buildings on Buena Vista Park - 75 Buena Vista East and 555 Buena Vista West - both located on the same street and within several blocks of the hospital.

"We undertook this survey recognizing that the economic profile of a renter is significantly different from that of a condo buyer. Certainly, condo buyers have more money and more cars.

"75 BUENA VISTA EAST - On the basis of a door-to-door survey and an interview with the apartment manager (April 9 and 10, 1983, we obtained a car and resident count for 36 of the 37 units in the building. The complex contains 24 studios and the rest are one-bedrooms. The rents, including utilities, ranged from \$259 to \$614.

"The survey revealed there were 40 residents in 36 units, 28 cars plus one occupant planning to buy a car in the near future, and two motorcycles.

"Factored out, the survey shows that 70 percent of the responding apartment residents own cars. Translated to the hospital complex that would mean that if there were 350 residents they would have 245 cars or if there were 300 residents, 210 cars.

"555 BUENA VISTA WEST - All information here was obtained from the building manager, who declined to let us do a door-to-door survey and was unable to tell us exactly how many people lived in the building. However, in an April 10, 1983 interview she conveyed the following:

"The building has 41 units - 12 studios and 29 one-bedroom apartments. Three units have two cars, five units have no cars, one unit has a motorcycle, and 32 units have one car - for a total of 38 cars.

X. Summary of Comments and Responses

"The building manager said that only one person is allowed to live in a studio, but she could not say whether one or more persons lived in the one-bedroom apartments. To estimate the resident/car ratio we assumed there were 12 people living in the 12 studios and 1.75 persons in each of the one-bedroom apartments (household average in Census Tract #170) for a total of 63 apartment residents.

"From that we deduced that 60 percent of the residents own cars. Now if 60 percent of 350 residents of the hospital development own cars, there would be 210 cars. The figure drops to 180 cars under the "best case" scenario of 300 residents.

"Again, the monthly rent in this building was relatively low, ranging from \$300 to \$800 - considerably less than monthly payments for a market-rate condo.

"To obtain the broadest statistical base from these surveys we combined the findings from both buildings, showing that 64 percent of the 103 residents own cars. Translated to the proposed project, that would mean that there would be 224 cars if there are 350 residents and 192 cars if there are only 300."

"CURBSIDE PARKING DEMAND

"To show a running tab on parking demand, let us summarize: U.S. Census figures show that parking demand for a 200-unit complex could be as high as 215 spaces. Our own survey shows that residents could have up to 224 cars. Therefore, if only 200 garage spaces are provided, 15 to 24 cars would have to park on the street.

"Adding 30 cars that are parked on the curb for convenience would raise the total curbside parking demand to 45 or 54 cars. This figure does not include visitor parking overnight nor the unknown variable of "more money/more cars". It does, however, suggest that on-street parking will fall within the high range of 40-80 curbside cars, estimated by the EIR, or even exceed it just for the residents alone." (CRD, pp. 27-30.)

" . . . Based on census data and a survey of two neighborhood apartment buildings, that parking demand by project residents could even be higher than the Draft EIR estimates, and that one off-street parking space per unit is totally inadequate. This is borne out by our findings on Pages 24 through 30." (Molly Hooper)

DISSIMILARITIES BETWEEN BUENA VISTA AND CHOSEN SITES

	<u>Park Hill/Buena Vista</u>	<u>D Hgts</u>	<u>Tel L</u>
Zoning Status	R-2	RM-3	RC-4
Existing Dwellings	Family Homes dating to 19th century	Originally zoned R-4, reduced to R-3. Part of the Master Plan.	Commercial area until TL built (8 yrs. ago) and recently 200 units at 101 Lombard (25% sold)

X. Summary of Comments and Responses

DISSIMILARITIES BETWEEN BUENA VISTA AND CHOSEN SITES (Continued)

	<u>Park Hill/Buena Vista</u>	<u>D Hgts</u>	<u>Tel L</u>
Dwellings in Immediate Area	Same as above	Mixed with RM-2 allows group housing boarding houses	Warehouses, office buildings, health clubs, two indoor parking garages, 800 stalls (public use)
Dwellings opposite proposed site	13 single and two family dwellings	4 story apt. bldgs. Rear of apt. unit on D. Heights Blvd.	200 condos 101 Lombard warehouse Architect Drafting Firm etc.
Average Years of Present Ownership	40	4	5
Natural Parks in Area	Yes	No	No
Indoor Pay Parking Stalls available	No	No	800 Plus
Parking Meters Adjacent	No	No	Yes
Permit Parking Area	No	No	Yes
Average Age of Dwellings in Area Residential	62 yrs.	7 yrs.	5 yrs.
Style of Architecture Residential Dwellings	Varied	Similar	Similar
No. Square Ft. required per unit	1,500 sq. ft.	Four story block units 400 sq. ft.	High rise 200 sq. ft.

 DISSIMILARITIES BETWEEN BUENA VISTA AND CHOSEN SITES (Continued)

	<u>Park Hill/Buena Vista</u>	<u>D Hgts</u>	<u>Tel L</u>
"Lot" open space	(125)	60	36
		200% less required (SIC)	350% less required (SIC)

(Red Rock) D Heights is a cul de sac.

(Joanne Jonas)

"It is also our belief that the parking demand study done of Telegraph Landing and Diamond Heights failed to shed much light on what might occur in our neighborhood if this project goes forward.

"We maintain that these two developments are not analogous to the St. Joseph site. Telegraph Landing is within walking distance of downtown, and Diamond Heights is quite isolated, with little competing parking.

"It has recently come to our attention that literally dozens of condos at Diamond Heights are vacant as a result of a financial scandal. Obviously, the Diamond Heights study should be disqualified. As for Telegraph Landing, the consultants had enough doubts about using it as a test site that they operated on the premise that their observations there would not be used if the data proved to be completely dissimilar from the data at Diamond Heights." (Molly Hooper)

"In Appendix J of our community reaction to the Environmental Impact Report, you will find a summary describing a likely scenario of an average buyer for one of these units. The average price of the units, on Page 23 [23a] of the EIR, is stated at being \$140,000. It is very important that an examination be made of the current financial requirements that would be placed out of necessity upon a buyer of one of these units. According to the calculations that I would urge you to examine in Appendix J of our report, you will find that, conservatively estimated, the average buyer of the average condominium unit at this Park Hill project must earn more than \$3,913 per month, or \$47,021 per year. And if they have any long-term debt of any kind on top of the cost of just turning the key in the door of this condominium, they will have to earn in excess of \$50,000 per year. Therefore, it is very simple to conclude that the bulk of the ownership of people who would be capable of buying these condominiums would be two working adults, and, therefore, in high income brackets, which would therefore indicate an increased number of automobile ownership and an increased frequency of automobile trips as a result of the required mobility to make a living to afford these kinds of units.

"Of most particular importance is the reliance of the authors of this Environmental Impact Report on two, what they claim to be analogous, sites, which has been brought up already. I would like to add to this questioning of these analogous sites.

"The Telegraph Landing was used, even though it had a much higher level, much greater number of two-bedroom units than the proposed project. But I think it is important to point out that over 75 percent of the current owners of the condominiums located in Telegraph Landing, over 75 percent of these condominiums were purchased prior to 1978, and the bulk of them were purchased in 1977. All of us are aware of the fact that interest rates at that time and purchase prices at that time were a fraction of what they are now. Therefore, to compare parking statistics and use and automobile trips in an area which is already dissimilar to that of Park Hill, in a development like Telegraph Landing, suggests that this is not an analogous site. And therefore, the findings based on surveys of this site are not appropriate and should not be used.

"The primary focus of this EIR is on the use of the Diamond Heights Village complex as an analogous site. I would like to point out that as a result of the recent investigations into the question of financing, large volumes of financing that were obtained by one of the owners, one of the developers of this condominium site, we understand that there are currently, and at the time the traffic surveys were done, in excess of 95 units vacant at Diamond Heights Village. The bulk of these units that were used, they were counted as a bedroom count and used to determine the number of vehicle trips and automobile ownership, that the bulk of these are currently held by Gibraltar Savings & Loan, who you will find most reluctant to disclose the fact that they have had to take back these condominiums as a result of a variety of reasons.

"Also, an investigation of the ownership at Diamond Heights Village will reveal that over 125 of the units in Diamond Heights Village are held in the name of one man, George I. Benny. The Environmental Impact Report somehow seems to be unfamiliar with the fact, in addition to this, these important facts, that, according to -- and I will give you the name in a moment . . . Midwestern Pacific Finance Company, who recently denied a residential loan application for a condominium located in the Diamond Heights Village, they stated that the reasons for denial was that only 18 percent of the 396 units were owner-occupied, and that an unknown number of units in that development, probably in excess of 95 units, were sitting vacant as a result of foreclosures instituted by various lenders in recent months. This has just been one in a series of loans denied at Diamond Heights Village as a result of the extraordinarily high vacancy levels and the extreme number of vacancies that have resulted as a result of foreclosure.

"It is incredible that this Environmental Impact Report would have stated, regarding this circumstance at Diamond Heights Village, that -- their only comment relative to owner occupancy was that, and I quote, 'Even though not all of the units at Diamond Height Village were owner-occupied . . .', and we are talking about 18 percent owner-occupancy." (Alex Gilbert Captanian)

"And even if we refer to Page 58 and take some of the association [Buena Vista Neighborhood Association] comments and dissuade -- not use the Diamond Heights Village, which may or may not be true -- I don't know. But if we use the Telegraph Landing example for parking, which seems to be the great concern of this group, peak parking demand, space per unit is 1.36 at Telegraph Landing. And the development at its maximum will also be 1.36. I don't know if you've been down to Telegraph Landing. It seems to work well. The condominium prices down there are high, and people still do buy them on their own. There are people who do make those \$50,000 incomes.

"True, some of the units might be bought by people that have two incomes, two people in one unit. But I think the majority of them, because of the size of the units, one-bedroom and two-bedroom, will be predominantly single professionals." (Graham Bryan)

RESPONSE

As discussed on p. 261 of the Draft EIR, sites for the parking demand study were chosen to be similar to the proposed project, - not to the Buena Vista neighborhood. The selection criteria were unit mix, unit price, and proximity to transit. The parking demand study was conducted for one reason only: to obtain an estimate of on-street, off-street and total parking demand per unit from condominium complexes in San Francisco. The measured demand rate (resident plus visitor) derived from the study was used to make an estimate of demand that might be generated by the proposed project. The projected demand from the project was added to the observed parking demand in the Buena Vista neighborhood to give an estimate of total parking demand in the neighborhood after project completion. This demand was compared by the EIR consultants to the observed parking supply in the neighborhood (see pp. 55-59 of the Draft EIR). A similar analysis was conducted by the community (see Appendix J "Parking Supply" of the CRD).

Parking demand data (on a per unit basis) from Diamond Heights Village and Telegraph Landing were used to predict total (on- and off-street) parking demand from the project, and on-street parking demand alone. Given the above data, an analysis of resident auto ownership is not necessary to estimate parking demand per unit at the project. If a vehicle is parked on-street it is irrelevant to determine if it belongs to a resident or visitor, particularly if on-street parking demand from that vehicle is applied to the project.

As the commenters indicated, they were denied access to information pertaining to resident auto ownership in one of their own surveys. License plate / address tracing is considered confidential by the Department of Motor Vehicles (DMV) and requires months of advance notice if it is to be used, and even then it can be denied by the DMV.

The Parking Demand study prepared by Wilbur Smith Associates (WSA), states that 189 of the garage spaces at Telegraph Landing are deeded to the owners of the dwelling units on a one-to-one basis, which indicates that these spaces are assigned to each unit.

The issue of curbside parking for convenience by condominium dwellers was adequately covered by the parking demand survey and by the Draft EIR (see pp. 260-266). The on-street parking demand measured at the analogous sites and the resultant figures of 40-80 on-street vehicles for the project includes on-street parking by residents. The commenter's estimates of parking demand at 75 Buena Vista Ave. East and 555 Buena Vista Ave. West (192-224 total, 45-54 on-street) are at the low end of the range of demand estimated on p. 57 of the Draft EIR (200-270 total, 40-80 on-street).

The WSA comment regarding the Telegraph Landing data was made only in reference to the fact that because it was difficult to isolate on-street Telegraph Landing demand from other on-street demand, the data collected might be too high, not that it might be defective. Were the Telegraph Landing parking data rejected, the Draft EIR estimate of the maximum curbside parking demand at the St. Joseph site would have to be revised downward from 80 spaces. This is discussed on p. 264 of the Draft EIR.

It should be noted that the "broadest statistical base" which the commenters used includes the same number of surveys (two) which was used to estimate parking demand in the Draft EIR. The commenter's surveys resulted in lower estimates of autos per unit than used in the EIR.

All of the factors listed in the commenter's tables of dissimilarities between the Buena Vista neighborhood and the selected study sites are not pertinent in estimating parking demand by Park Hill residents. Because the residents of the Park Hill project would be different from the existing neighborhood residents, the selected study sites were chosen as projects that would be similar to the proposed project, and not to the existing neighborhood.

c. Parking Supply

COMMENTS

"THE CURBSIDE PARKING STUDY IN THE EIR DOES NOT REFLECT EXISTING PEAK PARKING DEMANDS"

"The EIR surveyed 243 curbside parking spaces as potential parking for the project (EIR p. 133 [256]). This includes:

- 144 spaces on Buena Vista East, counting 18 perpendicular spaces in front of the College of Nursing
- 31 spaces on Park Hill
- 57 spaces on Roosevelt Way
- 11 spaces on 15th Street.

"The EIR parking survey included only three complete studies of curbside parking demand for the 243 designated parking spaces; a weekday at 6 p.m. (EIR p. 133 [256]), a weekday at 9 p.m. (EIR p. 133 [256]), and a Sunday at 4 p.m. (EIR p. 135 [258]).

"These surveys failed to cover the times when curbside parking is in greatest demand in our neighborhood - late nights and early mornings (when overnight parking can be measured)."

"The EIR 9 p.m. weekday survey showed a maximum curbside parking occupancy along residential frontage of about 65 percent. (EIR p. 33). Residential frontage was defined as having 130 parking spaces. (EIR 32).

"These findings are woefully unrepresentative, and we hasten to add, unprofessional and self-serving."

"The EIR gives more careful study to overnight parking at Diamond Heights and Telegraph Landing than it does to the proposed project site. There, at least, they studied overnight parking on three separate occasions - for late nights and early mornings - within the full survey area." (CRD).

"Late night parking at St. Joseph's was measured by Environmental Science Associates directly in front of the hospital site on seven consecutive nights. But the survey was limited to 11 p.m. and to 84 parking spaces on Buena Vista East, located directly in front of the hospital and the College of Nursing. These surveys were only very cursorily and inaccurately reflected in the EIR.

X. Summary of Comments and Responses

"The EIR states that an average of 10 parking spaces out of 84 were filled. In fact, based on their own survey (on record at the Planning Department Library), the findings ranged from a one-night low of nine cars to a high of 17, averaging out to 12 cars.

"It should be noted that 18 of the parking spaces surveyed were the perpendicular spaces directly in front of the Nursing College - a now empty facility, which has been approved for use as a 60-bed intermediate care medical facility - a topic we will discuss later as it will have significant bearing on future parking demand.

"In an effort to assess more carefully curbside parking demand in the study area we conducted our own survey on four separate days. (Appendix B.)

"CURBSIDE PARKING SURVEY BY THE BUENA VISTA NEIGHBORHOOD ASSOCIATION

"Our survey clearly showed that the curbside parking demand for the 243 on-street parking spaces was greatest overnight - ranging from 146 cars on Thursday, April 14, 1983, at 6 a.m. to a high of 161 vehicles on Sunday, April 10, 1983, at 6 a.m. It should be noted that in addition to the cars parked on the street there were 17 cars parked illegally in driveways, blocking the sidewalk, during the Thursday survey, and 29 cars illegally parked in driveways during the Sunday survey.

"THURSDAY OVERNIGHT LOW OF 146 CARS: This finding shows that 60 percent of the available curbside parking was filled even though the hospital and nursing college are currently unused.

"The EIR states that up to 80 curbside spaces would be filled by residents and visitors of the proposed project (a figure which we have established as conservative). So, subtract 80 from 243, leaving only 163 parking spaces available, for current neighborhood residents. With 146 cars, current residents fill 90 percent of the remaining 163 spaces.

"If an additional 18 spaces were eliminated for use by the nursing college, leaving only 145 curbside spaces for current area residents, current demand would be at least 100 percent of existing capacity.

"WEEKEND OVERNIGHT HIGH OF 161 CARS: This finding shows that 66 percent of the available curbside parking was filled, even though the hospital and college of nursing are currently not in use.

"If 80 curbside spaces were filled by residents and visitors of the proposed project, leaving only 163 curbside parking spaces, current demand would take up 99 percent of the available parking.

"If an additional 18 spaces were eliminated for use by the new owners of the nursing college, the current demand would be at 111 percent of existing capacity. In other words, there would be a shortage of 16 parking spaces." (CRD, pp. 31-34)

"Parking and traffic are heartfelt concerns of Buena Vista neighborhood residents. In both these areas, we feel that the Draft EIR significantly underestimated the impact on our community by the proposed development.

X. Summary of Comments and Responses

"The Buena Vista neighborhood already suffers from a parking problem, although in recent years this has been somewhat obscured because the hospital and adjacent College of Nursing have been virtually empty. But the Draft EIR never studied the problem closely. One of its greatest weaknesses is that it does not include a complete inventory of overnight parking in the neighborhood. This is something we considered to be a gross oversight. If it had, you would realize that parking is at full capacity on most streets in the neighborhood, and that the spillover is currently absorbed by parking at the now empty hospital and College of Nursing. To remedy this gap in the Draft EIR, we conducted our own survey of overnight parking. You will find it listed as Appendix B, or on Pages 32 to 35 of our critique. This survey, particularly one conducted at 6:00 a.m. Sunday, shows that parking demands for the 243 spaces on streets adjacent to the hospital could be at 111 percent of capacity. Let me repeat: 111 percent of capacity if this project goes forward. And that is using the Draft EIR's own projections for parking demand by project residents. For us, this is totally unacceptable." (Molly Hooper)

"... we feel that there will be an impact on the parking." (Lee Gilbert)

"I would be very appreciative if the Commission considered getting the developer to increase the number of parking spaces available to guests ...

"Even though one-for-one parking is available, most of us are frequently too lazy to put our cars into garages and therefore increase parking congestion on the street. If accessible "short-term" visitor parking were available, whether controlled or uncontrolled, this problem should be minimized and the actual saleability of the residential units would doubtless be improved." (John Lavrich)

"It should be noted that the draft EIR does not mention whether or not garage space at the proposed project would be rented or deeded to condo buyers as a part of the purchase price of their unit. Obviously, this has significant bearing on curbside parking demand." (CRD, p. 37)

"p. 57 -- What incentives would be provided for project residents and guests to use the parking lot instead of the street? Please specify operation of proposed garage, including security features." (CRD, p. 61)

"-- The "variables of human behavior" are one of the things you are supposed to be planning for. Don't just throw up your hands in despair. Let's have a list of ideas about how this would be handled." (CRD, p. 61)

"-- What is the demand for parking on other blocks in the neighborhood? It is currently very common for BV Terrace to park on BVE or Park Hill." (CRD, p. 61)

"In summary, the EIR unquestionably underestimated the amount of existing parking demand. Moreover, it should have widened the scope of its study area to include residential frontage on Masonic, Buena Vista Terrace, Upper Terrace and Buena Vista West - streets which are already overparked, thereby forcing residents to park their cars in the hospital area." (CRD, p. 34)

"Other areas that should be explored in the EIR under the subject of parking are: the effect of street sweeping in an area already pressed for parking and increased demand for parking in the Haight Street commercial area, where parking demand is already at full capacity.

May 5, 1975, 'Neighborhood Issues Paper', written by the Department of City Planning regarding Buena Vista Planning District #6 notes: 'The main problem here (the Haight Street commercial area) is the lack of adequate parking facilities for either residents of the area or potential customers.'" (CRD, pp. 36-37)

RESPONSE

The second paragraph on p. 33 has been changed to read:

"Late-night (11:00 - 11:30 p.m.) parking surveys conducted along Buena Vista Avenue East showed that of the 94 spaces available an average of 12 vehicles are parked along or across from the site and in front of the College of Nursing. Thus, parking is mainly associated with nearby residences; two service vehicles associated with the present use of the site were parked in this area."

The commenter has presented data which show peak weekday and weekend parking demands, recorded at 6:00 a.m., which exceed the estimates given in the EIR. At the hour of peak weekend parking (on a Sunday morning at 6:00 a.m.) in the data presented by the commenter in the CRD, there were only five vehicles parked along and across from the site frontage on Buena Vista Avenue East out of 66 spaces available there. Of these parked vehicles, two were presumably the service vehicles associated with the existing use of the site, which are parked there overnight. Sixty-three vehicles from the proposed residential development could therefore be parked there under such conditions without displacing existing users of the site's curbside space.

At the hours of peak weekday parking (on a Thursday morning at 6:00 a.m.) in the data presented by the commenter, there were 64 spaces available on Buena Vista Avenue East and 12 on Park Hill Avenue, a total of 76 spaces available along or across the street from the site, which could be occupied by project parkers without displacing existing parkers. It is apparent from this data that spillover parking from adjacent areas has not greatly affected parking availability along the project frontage.

The commenter has made use of the high estimate in the EIR for the project's curbside parking demand. The high estimate in the Draft EIR was not made on the basis of an assumption of full occupancy of the proposed 200-space on-site garage plus a spillover of 80 additional cars. Rather, the statistic of 80 vehicles parked at curbside for a 200-unit development was derived from the survey of the Telegraph Landing site's parking demand which can be considered to be greater than actual for on-street demand because of the "outside" influence of adjacent land uses (see pp. 264-265 of the Draft EIR). During that survey there were numerous vacancies in on-site parking, even when on-street parking was greatest, and the total demand per unit never exceeded 1.13 spaces per unit. At the proposed Park Hill residential project, the latter statistic would correspond to a total of 226 parked vehicles.

Of the estimates here presented by other commenters and of the estimates presented in the EIR, the highest estimate of the total number of project vehicles to be parked is 270 as stated on p. 57 of the EIR.

The highest overall estimate of existing parking space use in the area has been presented by the commenter, in describing totals observed on a Sunday morning, as discussed above. Under such conditions, 263 of the expected maximum of 270 project vehicles could be parked on-site and at curbside along or across from the site frontage without displacing existing parkers. This could be achieved only with full use of on-site parking. Such efficiency could be realized with valet operation of the on-site garage.

The seven existing parkers who, in the example above, would be displaced from the curbside parking along and across from the site frontages could be accommodated in front of the Nursing School building. Its future use would not generate a peak parking demand in early morning. The commenter's survey found only two vehicles now parked there at 6:00 a.m. on the Sunday of peak parking in the area.

Alternative B would provide two on-site parking spaces for each residential unit developed. This alternative will be considered for adoption by the City Planning Commission.

The number of parking spaces proposed as part of the project would probably be adequate, except on holiday or summer weekends. (See the discussion of parking on p. 59 of the Draft EIR.)

One of the mitigation measures which is not as yet proposed as part of the project, but which could be required by the Commission as a condition of project approval, is to provide valet parking in the garage (see p. 71 of the Draft EIR). This would decrease on-street parking demand, and would be available for use by guests.

No specific conditions of operations of the project's garage are included in the project sponsor's application. The common condition of use - assignment of spaces to the control of individual unit owners or tenants by ownership or rental - is noted on p. 57 of the Draft EIR. The bearing which such operation has on curbside parking demand is also discussed on p. 57 of the Draft EIR.

The parking surveys made by the consultant and presented by one commenter were of all vehicles parked on the surveyed segment of Buena Vista Avenue East and on Park Hill Avenue, regardless of their origin. The selected curbside survey area and the proposed 200-space on-site project garage were shown in the Draft EIR (as amended by the responses to comments herein) to contain an adequate number of spaces to meet a high estimate of future peak overnight demand if parking were 100% efficient. A proposed mitigation measure (p. 71 of the Draft EIR) of valet parking would increase efficiency of operation of the project's garage. Extension of the studied parking impact area to other streets, therefore, is unwarranted.

Street-sweeping activities in residential areas around the project site may be practically conducted during the day as at present. With residential development of the site, the hourly variation in use of curbside parking along the project site's frontage would change and would conform to the general pattern of the rest of the neighborhood. It is unlikely that daytime curbside parking along the site frontage would increase if the proposed residential development were constructed, as the limited existing use of the hospital building by about 60 employees now produces a substantial daytime parking demand.

There would be about 60-75 p.m. peak-hour vehicle trips to and from the project. Of this number, less than half (less than 35) would be made for non-work purposes such as shopping and recreation. Trips to the Haight St. commercial area would comprise a fraction of these. Trips for such purposes during other hours would not occur with significantly greater frequency. Parking demand in the Haight St. commercial areas attributable to the proposed development would therefore be less than 35 spaces. Any lunchtime use of parking in the Haight St. or Castro St. commercial areas by persons now employed on the site would be eliminated by development of the proposed residential project.

d. College of Nursing

COMMENTS

"THE EIR FAILED TO PROPERLY ASSESS THE FUTURE PARKING DEMAND THAT WILL BE GENERATED BY THE FUTURE USE OF THE COLLEGE OF NURSING: It should be noted that the EIR assumes that the 18 parking spaces in front of St. Joseph's College of Nursing will 'not be used by residents of the (hospital) project or by residents of the area.' (EIR p. 60.)"

"We wholeheartedly support this supposition. Little is known on the record about the proposed intermediate-care facility.

"We do know, however, that the facility was approved by the Planning Commission with no on-site parking provided.

"The City Planning Commission Resolution No. 9550, passed Nov. 4, 1982, was approved with almost no opportunity for public comment. Only a handful of area residents were notified of public hearings concerning this project. Therefore, the Planning Commission should bend over backwards to be sensitive to community concerns regarding this project and its cumulative impact with the proposed hospital development.

"What do we know about the project?

"-- The EIR states that there will be 11 full-time and seven part-time employees. How many of these will be live-in?

"-- The Wall Medical Group's application sought permission for a residential care facility for up to a maximum of 60 beds, up to an additional 1,000 square feet of related office/work space, 10 rooms or suites for hotel space, and up to 10 residents in a group housing situation.

"The application notes 'that there may be a need for the housing of nurses, employees or others in conjunction with the operation of such a facility.' Is this the 'group housing situation' to which they refer?

"When the application was approved, the Planning Commission established certain conditions for the facility's operation. Approval was for a 'mixed use project limited to a maximum of 60 residents in a residential care facility, with up to five rooms for occupancy by families or friends of residents in the residential care facility, and up to 9,800 square feet of related office/work space generally including but not limited (our emphasis) to administrative offices, record storage, medical laboratory space, counseling area and data processing services.'

X. Summary of Comments and Responses

"Our interpretation of the Planning Commission's decision, based on the resolution and the Wall Group's application, suggests that under maximum mixed use, the facility could include 45 patients, five guests and 10 live-in employees.

"Both the guests and live-in employees might well have cars. And while the Wall Medical Group has said it doesn't believe its patients will be able to drive, that does not eliminate the possibility that they might have to be driven to the facility prior to hospitalization.

"WE DISAGREE WITH THE ASSUMPTION THAT PEAK PARKING DEMAND ASSOCIATED WITH THE BED AND CARE FACILITY WILL OCCUR DURING WEEKDAYS:

"Indeed, it is more likely that peak visitor parking for the facility will occur weeknights and weekends when visitors are not at work.

"In summary, the 18 perpendicular parking spaces in front of the College of Nursing should definitely not be included as potential parking space for residents or guests of the proposed hospital project. There may be considerable spillover parking demand from the bed and care facility that would encroach on what the developers consider to be curbside parking for the hospital site." (CRD, pp. 34-36)

"Moreover, we know that the Wall Medical Group is concerned about parking. In a recent telephone interview with Jim Carroll of the Wall Group, he said he is exploring the possibility of renting garage space from the hospital developers." (CRD, p. 36 and Molly Hooper)

"p. 59 -- Add peak parking demand of existing neighborhood and School of Nursing to this analysis." (CRD, p. 61)

"p. 60 -- School of Nursing peak visitor demand might well be on weekends. Please examine." (CRD, p. 61)

RESPONSE

The intent of the cited discussion in the Draft EIR is to note that the estimates and analyses in that document are not based on any assumed future availability of the parking in front of the College of Nursing by existing or future residents of the area.

No on-site parking would be provided at the College of Nursing site, which is now approved for use as an intermediate care facility. The possibility that parking demand at the facility could exceed expectations is noted in the first partial paragraph on p. 61 of the Draft EIR. The text on that page has been revised to read:

"Should parking demand for the bed and care facility exceed the demand for 18 spaces or displace existing parking currently used by neighborhood residents (1-11 spaces) along the college frontage, then parking demand from the facility would spill over into parking spaces along the site frontage and into the nearby neighborhood. (The range of existing parking in front of the college of nursing is based on Figures E-1, E-2, and E-3, on pp. 256-258 and on Appendix B of the Community Response Document, April 28, 1983, prepared by the Buena Vista Neighborhood Association.) The peak demand for parking spaces associated with the proposed bed and care facility would occur during the day, and would not coincide with the peak overnight parking demand of existing neighborhood residents and residents of the proposed Park Hill residential project. Visitor parking could occur during the peak weeknight and weekend periods."

The project sponsor indicates that it has not been approached by the Wall Medical Group concerning the possibility of leasing parking spaces at the proposed Park Hill project (Stephen R. Koch, Prometheus Development Company, telephone conversation, June 16, 1983).

e. Crime and Safety

COMMENTS

"It should also be noted . . . that there will be potential for more crime in the neighborhood. Many more cars will be parked next to Buena Vista Park, allowing thieves easily to break into these cars and escape into the park. I won't even talk about the possibility of violent crimes." (Greg Gaar)

"Regarding area parking, we need to know if most residents in the area, current residents, have garages. If not, parking away from homes becomes a safety problem as well as a convenience problem. Most people in the Haight know that just currently there is a real safety problem for women, particularly in the Panhandle area. But I have not heard that this area gets any prizes for safety. I think you need to analyze the situation of parking for the homes, and I don't think it's been done.

"The burden on a neighborhood of fear at night, if they can't park near their homes, is treated too superficially. It just says 'people may not get to park there.' We need to have a little analysis of what that means. Probably needs some data on other crimes in the area and what problems this creates for neighbors unable to park." (Susan Bierman)

RESPONSE

The surveys of late-night parking along the site frontage and nursing school frontage on Buena Vista Avenue East (p. 33 of the Draft EIR) indicates that currently some parking away from homes in the area occurs at night.

The curbside parking spaces in the area have peak weekend overnight use of essentially 100% of available spaces along the existing residential frontages of the survey area. Under such conditions there is competition for available spaces and individuals are not always able to park in front of their homes.

The site is in Plot 528 of the San Francisco Police Department's Mission District Reporting Area. The site is in an area with a low to average crime rate, when compared to the Mission District as a whole. In 1982, a total of 142 crimes were reported in Plot 528. These crimes included eight non-residential burglaries, one purse snatch, one strong-arm robbery, and five aggravated assaults. No rapes were reported.

The following has been added to p. 59, as the last sentence of the second paragraph:

"If residents are unable to park near their homes at night the opportunity for incidents of crimes against residents walking to their homes would increase."

6. TRAFFIC HAZARDS

a. Roadway Hazards and Traffic Conflicts

COMMENTS

"From the neighborhood perspective the extraordinary gradients (some exceed 30 per cent), the blind intersections and the edge conflicts make for a difficult traffic ecology on Buena Vista hill not addressed on the draft EIR.

"Traffic studies and maps by the sponsor treat this prominent hill as if it were flat (no traffic maps indicate sloping streets). They also treat the streets as if they were a simple grid, ignoring the blind curves and complex intersections.

"The several slopes exceeding 17 percent effectively exclude traffic, and when they do carry traffic it is precarious and dangerous for pedestrians, drivers and property. (See Appendix C).

"Most of the street gradients in the area exceed maximum design standards (7 percent)¹ for safe carrying of passenger autos. But this is hilly San Francisco! The hills in our neighborhood are fine, but clearly they cannot take significantly increased traffic loads without endangering the area's livability and its safe streets we now cherish and have to fight to preserve.

"Design standards for commercial vehicles is 3 percent. Construction trucks, delivery trucks and moving vans will have a great deal of gear shifting to do on these steep slopes; their only approach is a 12 percent grade.

"In addition to the steep slopes, blind intersections are in abundance due to the poor gradient relations of street alignments. (These streets were laid out in the 19th century - before the advent of the automobile!) These intersections obstruct normal vision, so necessary for safe negotiation of turns and parking.

"Edge conflicts (see Appendix C) arise from the steep grades and curving roads. Perpendicular parking is blind, causing frequent traffic interruptions.

"Street widths vary so the location of the travelled roadway is confused, making turns (for example, Java Street at Buena Vista West) unsafe and parking locations critical.

"Below are listed some of the streets feeding into Buena Vista Avenue and their respective characteristics:

"Central: Between Buena Vista West and Waller the slope is 30 percent.

"Haight and Buena Vista East: The slope here on Buena Vista East is 12 percent. The intersection here is blind because of its acute angle, a fact which is compounded by parallel parking on one side, and perpendicular parking on the other. Moreover, the steep grade going up from Haight prompts many drivers to accelerate in order to make the hill - a particular hazard with perpendicular parking.

¹/ Site Planning Standards, Joseph Chiara and Les Koppleman, McGraw Hill, 1978." (CRD)

X. Summary of Comments and Responses

"Intersection of Duboce, Buena Vista Terrace and Buena Vista East: Drivers on Duboce experience a momentary blindness because of the 26 percent grade. The intersection for these three streets is badly defined because of the acute angle for Buena Vista Terrace.

"Park Hill and Buena Vista East: The acute corner here causes a lack of visibility. The draft EIR places the proposed garage entrance for the development project only 10 feet from this intersection - a factor certain to complicate the situation. Usually, entrances of this sort are located at least 15 feet from an intersection.

"Park Hill to Roosevelt Way: The intersection here has two acute angles (Roosevelt Way and 15th Street). The problems here are exacerbated by Park Hill's steep slope - more than 18 percent.

"Roosevelt Way and Buena Vista Terrace: The problems here stem from the sloping (10 percent grade) and curving of Roosevelt Way. The jagged alignment between 15th and Buena Vista Terrace leaves many drivers uncertain of how to proceed.

"Buena Vista Terrace and 14th: This intersection is hazardous because of a blind spot caused by a 21 percent slope on 14th and also because of the curving approach of Roosevelt Way. These factors make drivers blind at both the top and the bottom segments of 14th.

"Buena Vista West at Upper Terrace: This intersection represents the crown of a hill, making the approach for oncoming traffic blind. The slopes for both roads are 10 percent. The intersection is further complicated by clustered parking at the closed-off entrance to the park and by the fact that Buena Vista is much wider than Upper Terrace.

"Buena Vista West at Frederick: Frederick has 19 percent slope, making drivers blind. The fact that Buena Vista curves and has a 10 percent slope at this intersection makes the intersection additionally hazardous.

"With the renewed use of the hospital, driving in front of the complex will become dangerous as cars will be parked perpendicularly on one side of Buena Vista East and parallel on the other. The combination of steep grades and a curving road make perpendicular parking blind and traffic interruptions frequent.

"It should be noted that the roadway in front of the hospital, just before the 'no parking area' is only 45 feet wide. The perpendicular parking spaces measure 15 feet into the roadway. Another 10 feet of roadway width should be allowed for vehicles parallel parked. This leaves only 20 feet in the roadway for passing cars - a dangerously small amount of room, particularly because the road curves." (CRD, pp. 18-22)

"pp. 30-31 -- More attention needed to topography, steep, narrow streets, poor lines of vision, etc." (CRD, p. 59)

"p. 32 -- Parking on both sides of the streets exacerbates traffic problems. Steepness of Duboce ignored. EIR should note it is 2nd steepest street in the city." (CRD, p. 59)

"p. 34 -- Map ignores topography. This ain't Fresno, folks." (CRD, p. 60)

RESPONSE

To show the hilly character of the neighborhood, contours of elevation have been added to Figure 15 on p. 34 of the EIR (see p. 104). A new Figure 14a has been inserted into the EIR. Figure 14a shows roadway grades, and locations of critical intersections and parking difficulty in the Buena Vista neighborhood. Figure 14a is based on information on pp. 18-22 and Appendix C of the CRD, as verified by data obtained from the Bureau of Surveys, Department of Public Works. Information concerning slopes and impaired lines-of-sight on roadways in the area is on pp. 30 and 31 of the Draft EIR. The following has been added to the beginning of the third paragraph on p. 31 of the Draft EIR:

"Many streets in the vicinity of the project are, steep, (grades of over 7%), with poor alignment and blind intersections. These factors impair circulation and parking and increase the risk of traffic hazards (see Figure 14a, p. 31b)."

The proposed garage entrance to the project is about 50 ft. from the intersection of Park Hill Ave. and Buena Vista Ave. East (see Figure 9, on p. 20 of the Draft EIR). The angle at the corner is about 65 degrees. This angle causes some impairment of sight distance but is not sufficiently acute to cause total impairment. Traffic approaching Buena Vista Ave. East on Park Hill Ave. is controlled by a stop sign, and a clear view of Buena Vista Avenue East traffic is afforded at that location.

The impairment of lines-of-sight at the intersection of Park Hill Ave. and Roosevelt Way is noted on p. 31 of the Draft EIR, and the slope of Park Hill Ave. is discussed on p. 30. Fifteenth St. is one-way eastbound and has only a departure lane from its intersection with Roosevelt Way. Sight distance impairment from Fifteenth St. on to Roosevelt is therefore minimized. The acute intersection of 15th Street and Park Hill Ave. has been indicated on Figure 14a.

Conflicts between vehicles backing out from perpendicular parking spaces and eastbound traffic on Buena Vista Ave. East presently occurs with use of the site by Children's Hospital employees. These conflicts would increase with residential development of the site. The curvature of the roadway, and the potential for one parked vehicle (e.g., a van) to block the line-of-sight for other drivers backing out would impair roadway safety. Backing maneuvers also would cause momentary delays of traffic.

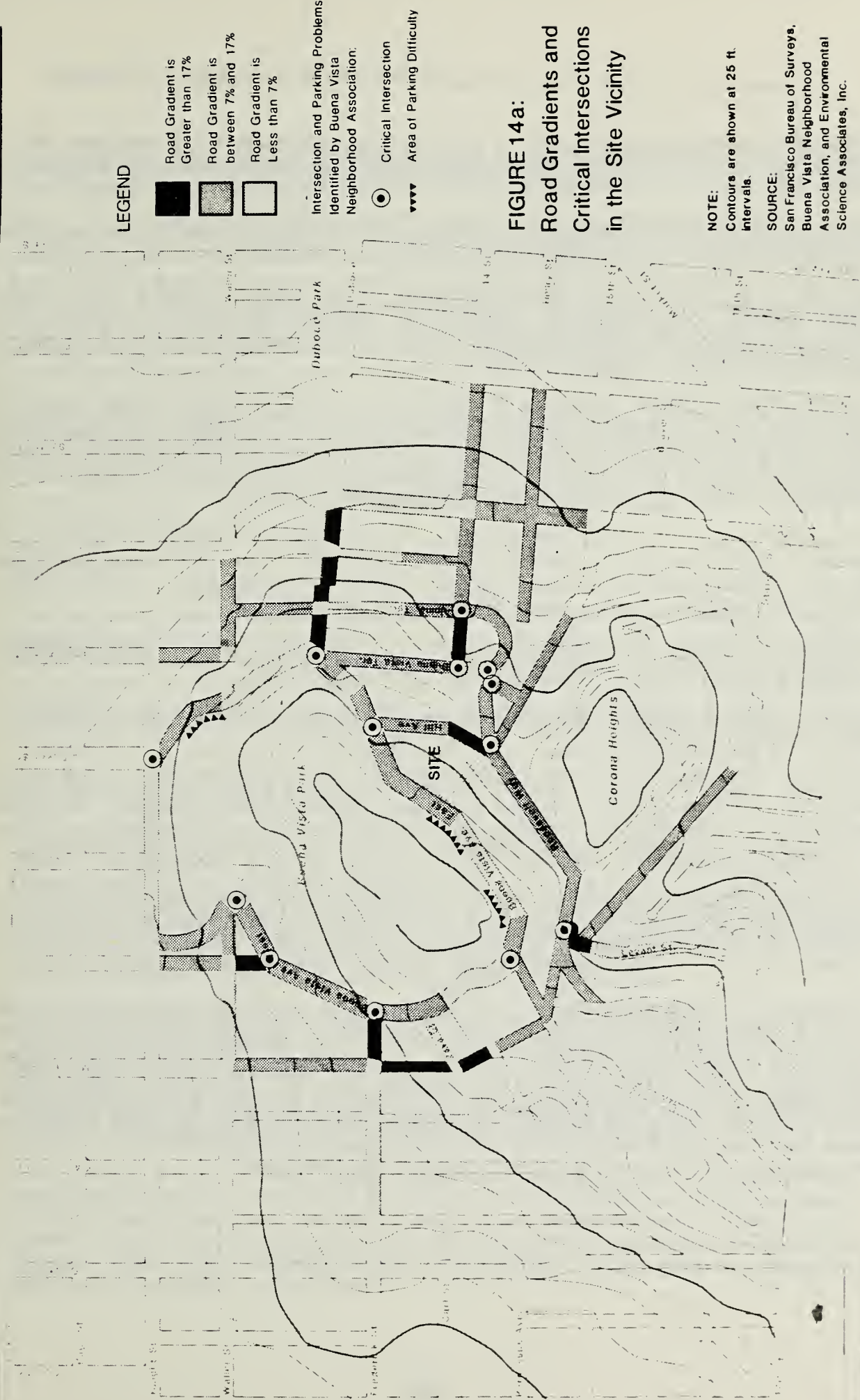
Duboce Ave. between Castro and Divisadero Sts., has a grade of 27.5%, making it the third steepest street in the City. Between Divisadero St. and Buena Vista Ave. East, Duboce has a grade of 25%.

b. Accident Rates

COMMENTS

"Accident Rates in the Proposed Project Area.

"The accident rates cited in the draft EIR are highly deceptive and truly not representative of the traffic hazards in our neighborhood.



LEGEND

- Road Gradient is Greater than 17%
- Road Gradient is between 7% and 17%
- Road Gradient is Less than 7%
- Intersection and Parking Problems Identified by Buena Vista Neighborhood Association:
- Critical Intersection
- Area of Parking Difficulty

FIGURE 14a:
Road Gradients and
Critical Intersections
in the Site Vicinity

NOTE:
 Contours are shown at 25 ft. intervals.

SOURCE:
 San Francisco Bureau of Surveys, Buena Vista Neighborhood Association, and Environmental Science Associates, Inc.

X. Summary of Comments and Responses

"The report states that there were a total of 33 accidents during a five-year period (1977-81) on Buena Vista Avenue East between Buena Vista Terrace and Upper Terrace, on Park Hill Avenue, and on Roosevelt Way, between Buena Vista Terrace and Museum Way.

"These figures reflect the number of accidents which occurred only on the road segments immediately adjacent to the hospital site." (CRD, p. 17 and Molly Hooper)

"Because of the unusual topographical character of the Buena Vista area, steep street slopes, unusual road alignments, road curves, perpendicular parking problems and dangerous intersections, we believe that the EIR should include accident rates for all of the major approaches to the hospital site."

"Using the same source as the draft EIR (Nelson Wong, associate traffic engineer, Department of Public Works, Bureau of Engineering, Division of Traffic), we learned that during the same five-year period, 1977-81, there were: a total of 80 accidents on Buena Vista East and West; 30 accidents on Duboce from Castro to Buena Vista East; and 37 accidents on 14th Street, between Castro and Buena Vista Terrace.

"If you add to these the draft EIR figures (p. 136) [p. 259] for accidents on other road segments directly adjacent to the hospital site (Park Hill 2; Roosevelt Way 9; and Upper Terrace 1), which total 12, you get a GRAND TOTAL of 159 accidents - in other words, almost FIVE TIMES the number of accidents cited in the report."

Based on our findings, we find it only logical to ask what are the acceptable parameters regarding accident rates in our neighborhood?" (CRD, pp. 17-18)

"p. 31 — Lots of accidents are not reported to police; neighborhood survey needed." (CRD, p. 59 and Molly Hooper)

"... I want to turn to the subject of traffic hazards, an area that is hardly touched in the Draft EIR. The hospital site is located on a steep hill that is full of dangers. All of the approaches are steep, replete with blind spots for drivers and are characterized by unusual road alignments, road curves, perpendicular parking problems and dangerous intersections.

"We did so, inventorying accidents on the full length of Buena Vista East and West and on Duboce from Castro to Buena Vista East and on 14th between Castro and Buena Vista Terrace. As a result, we found that during the same five-year period, there were not 33 accidents, but 159 . . . five times the number of accidents cited in the report.

"The Buena Vista neighborhood has a unique topography. Its streets were laid out during the 19th Century, before the advent of cars. Our streets are more like spaghetti strips than neatly uniform roads laid out on a grid. To give you an idea of what we are talking about, just look at Appendix C of our critique, on pages 18 to 22. Virtually every intersection on Buena Vista East and West is a blind spot and steep grade, of at least ten percent, with several grades exceeding 20 percent. Moreover, there are three sections on Buena Vista East and West that allow perpendicular parking, including directly in front of the hospital complex, certain to cause frequent traffic interruptions.

X. Summary of Comments and Responses

"The combined effect of these hazards, pressed to the limits by so many additional cars, would make driving increasingly treacherous." (Molly Hooper)

"Page 31. It is difficult to understand the accident rate you talk about. Whether it is normal or unusual, whether the curve of the street or the steepness of the streets involved has anything to do with it -- there is kind of a passing statement that no conclusions can be drawn because the City Attorney won't let us have the facts, or something, or the City Attorney's Office does not let that kind of information out. I didn't understand it. That is the first time I have seen that in an EIR, so I would like an explanation of why that is so. If the City Attorney says it can't be, perhaps there just has to be discussion with Park [Mission District] Police Station about accidents up there. To me, it seemed kind of high accident rate. But there is nothing to compare it to. I suppose we need a comparison of those streets with maybe Downey Street or maybe just with Page Street. Is there some significant problem on Buena Vista because of blind streets? I know for a fact you can't see up there when you are turning some corners, when you are coming up some hills, when you are coming up Duboce, which is a real steep incline. And this EIR doesn't deal with that at all, how steep it is when you come up from, I guess it's Duboce from -- What is that? Divisadero." (Susan Bierman)

RESPONSE

Comparison of gross numbers of accidents on street segments cannot be used to give an indication of high traffic hazard situations. Accidents are caused by numerous factors; accident analysis attempts to measure gross numbers of accidents in terms of an exposure to causative factors. One element of exposure is traffic volumes. Typically, a greater number of accidents is to be expected on more heavily traveled segments. Table E-1 on p. 259 of the Draft EIR Appendix presents accident rates computed on an accident-per-million-vehicle-miles basis. Accident rates as low as one accident per million vehicle miles may be achieved on wide, well-divided, well controlled and level thoroughfares.

Factors cited by the commenter, such as steep slopes, unusual road alignments, curves, perpendicular parking, and poor sight distances at intersections are also factors which cause accidents. Of these factors most are present in the Buena Vista neighborhood and other City neighborhoods. It is difficult in practice to effectively remove or avoid these causative factors in the design or improvement of streets, so that accident rates such as those shown in Table E-1: ACCIDENTS IN THE VICINITY OF THE PROPOSED PROJECT, p. 259, are common in hilly areas.

To make an effective evaluation of traffic hazards in the Buena Vista neighborhood, accidents must be analyzed not in terms of gross numbers, but on the basis of time of day of occurrence, type of accident (rear-end, sideswipe, etc.), cause of accidents and weather conditions. To make a relative assessment of hazards, the accident analyses also must be compared to analyses of neighborhoods which are similar in terms of street grades, traffic volumes, sight distances, and so forth.

The Traffic Bureau of the Police Department indicates that the Buena Vista neighborhood has "low to average" accident rates for San Francisco. (William Horner, Traffic Analyst, San Francisco Police Department, telephone conversation, July 13, 1983). Accident statistics reported on p. 259 of the EIR are accidents reported to the police. There is no feasible method of compiling reliable data on unreported accidents in a specific neighborhood.

X. Summary of Comments and Responses

The Traffic Bureau maintains an on-going record of citywide accidents on a computer system shared with the Department of Public Works (DPW). DPW uses the citywide accident data to identify hazardous conditions which may be improved, and to establish priorities for roadway improvements. The Registered Civil and Traffic Engineer of the environmental consultant attempted to examine the DPW collision diagrams and computer records of accidents in order to assess hazards specific to the area and to propose in the Draft EIR improvements or changes in traffic and parking controls which could be implemented for the project.

DPW was unable to allow the consultant access to the diagrams or the data, because of a policy imposed by the City Attorney's office. On the basis of two court rulings, the City Attorney's office has adopted this policy to minimize potential liability from accident suits (John J. Teheny, Attorney, San Francisco City Attorney's Office, telephone conversation, June 13, 1983 and Andrew Schwartz, City Attorney's Office, telephone conversation on June 14, 1983). Detailed accident data are released only under a special subpoena or, under certain conditions, by a special request from a City department or agency. The only information released to the consultant was the total number of accidents along segments of roadway over a five-year period. These data do not allow any more detailed discussion of accident hazards than is given above or presented on pp. 31-31a of the Draft EIR.

The study area for accident rates was limited to the streets in the immediate project vicinity because this is the area within which project-related impacts could be clearly identified. While drivers from the project would travel on streets beyond the immediate vicinity of the site, the dispersal of project traffic on various routes beyond the immediate project vicinity would minimize any measurable effect project traffic might have on accident rates on those streets.

See p. 148 for a description of the steep grades of Duboce Ave. between Castro and Divisadero Sts.

c. Traffic Controls

COMMENT

"Finally, we want to add that while the conventional wisdom in dealing with traffic hazards is to add traffic control signs, we feel that this approach - while obviously welcome - would only serve as a band-aid effort to correct a problem that is inherent in the topography and road lay-out of the area. One must look at the reality of the existing situation. More cars most certainly would aggravate the existing hazards.

"Moreover, you should know that the neighborhood asked within the past six months for some stop signs for the park area but was refused. We did, however, get eight speed limit signs - a small concession to neighborhood concerns." (CRD, pp. 22-23)

RESPONSE

The sentence below has been added to the end of the second paragraph on p. 54 of the EIR:

X. Summary of Comments and Responses

"This additional traffic would be expected to increase traffic hazards in the project vicinity roughly in proportion to the amount of new traffic generated. The project would generate about an 8% increase in peak-hour vehicle trips."

As noted on p. 71 of the Draft EIR, the project sponsor would install a stop sign and associated pavement control markings on the Park Hill Ave. approach to Roosevelt Way, as mitigation, if requested by the Department of Public Works Traffic Bureau.

7. VISUAL EFFECTS AND ARCHITECTURAL QUALITY

a. Convent

COMMENTS

"The EIR does not adequately address the question of whether the convent building can be converted into housing. Both Children's Hospital (see J. Rock Tonkel letter to Neighborhood Association of 12/8/80 and the 1980 Sanger Feasibility study assume the convent building will be demolished." (CRD, p. 55)

"p. 26 -- The convent is, in fact, readily visible from Buena Vista E." (CRD, p. 59)

RESPONSE

The Tonkel letter and the Sanger Study reflected a previous belief that the convent building would have to be demolished because of the structural difficulties and expense of bringing it into compliance with seismic standards. Subsequently, it was determined that the building could be brought into conformance with seismic requirements by constructing a 16-ft. wide addition with shear walls on the west side which would buttress the building (see the last paragraph on p. 41 of the Draft EIR for a discussion of the building addition).

The convent is visible from portions of Buena Vista Ave. East. As Figure 13 on p. 27 of the Draft EIR shows, the hospital blocks views of the convent along Buena Vista Ave. East from west and northwest of the hospital. The fifth sentence of the fourth paragraph beginning on p. 26a is replaced with the following:

"The convent is not visible from Buena Vista Ave. East adjacent to the hospital, as it is blocked by the 76-ft. high hospital building. The convent is partially visible from views north of the hospital."

b. Scale

COMMENTS

"The EIR attempts to justify new construction along Park Hill Avenue on totally bogus grounds. It states that the new construction is necessary to 'provide a sufficient visual transition from the existing residence to the taller hospital and convent buildings' (EIR at p. 82 and p. 84). In fact, the existing open space along the west side of Park Hill Ave. provides such a transition. The EIR itself recognizes the 'park-like appearance' of this

X. Summary of Comments and Responses

area (EIR at p. 29). The proposed new construction might arguably provide a visual transition if viewed from an airplane taking off from SF Int'l (EIR p. 84) but, from the perspective of the neighborhood, it adds an additional mass to an already vastly oversized complex. The need to retain the existing open space between the hospital building and Park Hill Avenue as a genuine transition and the unattractive bulk of the proposed new buildings can be seen by comparing the photos in the EIR at pp. 44 and 45.

"The 'open space' presently used as a parking lot should be viewed as a necessary set back. The new proposed construction certainly does not 'respect the scale of nearby residences.' It would be well over twice their height and would cast them into shadow (EIR p. 2). (CRD, p. 46).

"The 320 ft. long by 75 ft. high hospital building is presently vastly out-of-scale with the surrounding two-story single family dwellings. The sponsor argues that by adding more building to the site, a visual transition between existing residences and the large hospital could be achieved. But those transitional scale elements already exist in the form of mature trees and by the open space that effectively sets back the huge hospital from Park Hill residences." (CRD, p. 47 and Michael Immel)

"pp. 44-45 -- Pictured illustrate that existing open space - not new buildings - are needed to reduce massive bulk of existing hospital complex." (CRD, p. 60).

"p. 40 -- 'Transitional scale' concept is designed to be seen from Market St. (EIR p. 84). It has nothing to do with the neighborhood which should be the primary concern according to city policy." (CRD, p. 60)

"SCALE. The unique character of the Buena Vista neighborhood is due in large part to its steep and curving topography and its diverse and finely scaled residential architecture. Architectural designs proposed for this area should respond to its fine scale. The Park Hill proposal . . . is designed to be seen from a distance (i.e., Market Street) as a line of tile roofs stepping upwards toward the higher, similarly designed, roofline of the hospital building' (p. 84 EIR Draft). The sponsor's design concept obviously places citywide vistas above sensitive respect for the neighborhood context." (CRD, p. 47 and Michael Immel)

" . . . this new construction is not designed to complement the existing architecture of Park Hill." (Michael Immel)

"Clearly, the sponsor is not designing the project from the standpoint of the neighborhood or the community surrounding the structure." (Michael Immel)

RESPONSE

The statements on pp. 82 and 84 of the Draft EIR explain the sponsor's reasons for rejection of Alternatives B and C. These statements are the opinion of the project sponsor, and do not indicate that new construction is necessary to provide a visual transition as referred to by the commenter, but that new townhouse construction would provide a visual transition from existing residences to the taller hospital and convent buildings. As shown in Figures 8 and 18a on p. 10 and 45 of the Draft EIR, lines-of-sight from pedestrian height at the east side of Park Hill Ave. would meet the roof tops of both the new buildings and the hospital. In other words, if the new buildings were any lower, the hospital would still provide the skyline silhouette from this point; if the new buildings were any higher, they would block views of the

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hospital from this point and become the skyline. In this sense, they provide a visual transition. As shown by Figure 18, trees can also provide a visual transition and buffer between structures of contrasting scale.

The following sentence has been added after the first sentence in the second paragraph on p. 41 of the EIR.

"The new construction would lessen the park-like appearance of the site when viewed from street level on Park Hill Ave."

A paragraph break has been inserted after the fifth sentence in the second paragraph on p. 40a of the EIR., In the new third paragraph, the sentences below have been added after the second sentence:

"However, the scale of the new construction would differ from the homes on Park Hill Ave. in that the townhouse structures would be attached and would be 10 to 24 ft. higher above ground level than the existing houses."

As discussed in the second paragraph on p. 51 of the Draft EIR, the new construction would shade the residences at 267 Buena Vista Ave. East on December afternoons, and would shade residences and sideyards at 45, 47, and 49-51 Park Hill Avenue on spring and fall afternoons. Other residences on Park Hill Ave. would not be shaded by the construction at any time of the year.

Add the sentence below to p. 26 of the EIR at the end of the third paragraph:

"The six-story hospital building does not reflect the character or scale of the surrounding Buena Vista neighborhood, which consists primarily of detached two- and three-story residential structures."

The comment that the "transitional scale" concept is designed to be seen from Market St. is referring to phrases that were used in two separate sentences. The seventh sentence in the second paragraph on p. 40 of the Draft EIR states: 'The average height [26 to 44 ft. high] of the new townhouse structures would provide an intermediate transitional scale between Park Hill Ave. and the hospital building which is 76 ft. high. The second reference is to the third full sentence on p. 84 of the Draft EIR. This sentence was not meant to imply that the new construction was designed to be seen exclusively from a distance, and has been revised as shown below:

"In the proposed project, the new construction as viewed from a distance (i.e., Market St.) is designed to be seen as a line of tile roofs stepping upward toward the higher, similarly designed, roofline of the hospital building."

The latter sentence is the opinion of the sponsor, and as the commenter notes, does not address the visual effects of the project when viewed from adjacent neighborhood streets. The sponsor believes that views of this prominent site from more distant points is a legitimate concern. (Stephen Koch, Project Manager, Prometheus Development Company, telephone conversation, June 14, 1983.)

c. Visual Effects

COMMENTS

"The draft EIR presents several figures and a little text to describe the impact of the new construction on the visual quality of the Buena Vista neighborhood. But, consistent with all of the sponsor's presentations to date, the EIR Draft fails to be informative, or worse yet, presents conflicting information:

"In Fig. 7, page 18, a sketch of the Park Hill elevation fails to make clear that the parking garage 'would e partially visible near the intersection of Park Hill Avenue and Buena Vista East'." (page 41, EIR Draft) (CRD)

"In this case, there is a conflict. The sponsor realizes that there is a parking garage to be visible at the corner of Park Hill and Buena Vista East, but in the drawing at Figure 7, no parking garage is designed in." (Michael Immel)

"New construction proposed alaong Park Hill Avenue would have a detrimental effect on the finely scaled existing residences with their immaculate flower beds, clipped hedges and carefully pruned street trees. At the corner of Park Hill and Buena Vista East, proposed buildings would rise four stories (44 ft.) plus one 10 ft. parking structure. The whole mass would resemble a 5-story structure, rising to elevation 449, 57 ft. in height from the corner street elevation of 392. (See Fig. 8, p. 19, EIR Draft)." (CRD, p. 47 and Michael Immel)

". . . I couldn't find anything about the view from Buena Vista Park over the project looking toward, well, the Market Street part, below Roosevelt Way, whatever we call that . . . I guess the Castro area. I have walked up there, but not lately, and there is a viewing area where people go up and sit. They look, I think, over the St. Joseph's site. There is nothing in here about that. Now, maybe there is no view blockage, but it seems to me that it is possible, where the new construction is going to go, it may affect views from the park. If there is any effect from any part of the park, that ought to be explained — or any view from the park should be talked about." (Susan Bierman)

"Page 13 and Page 19. One is the photo of the model and one is a site section. When I went to see this model with the developer's representatives and the developer, . . . and I didn't think it was accurate. They assured me it is accurate. But in looking at this photo and the Site Section, there is a remarkable difference. The Site Section really shows how high the new construction would be toward Buena Vista East, and it shows the buildings on Park Hill to the east. The model, however, doesn't show — I mean, the photo doesn't show all of the houses on Park Hill. So, by the time you are looking at the new construction, I think if I remember the new construction on the site, you don't see the houses across the street on Park Hill. So, that photograph should be corrected to show all of Park Hill and the new construction. But what I think has happened in the model, ... I think that you have not shown the steepness of the embankment as it goes up to the site, then you don't show in the model the real difference in height between those new houses and Park Hill. What I am trying to get at is: How high they will be and how they will look from those houses and what kind of impact they will have on the houses on Park Hill. Because I think they are going to look like a high wall of houses, and you are going to have to look up at them." (Susan Bierman)

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RESPONSE

Figure 7a has been added to the EIR (see p. 158 of this document). Figure 7a is a sketch of the northern portion of the hospital building and new construction, where the four-story structures are located. The parking garage would be visible at the northwest corner of the site. The garage is not shown in Figure 7 on p. 18 of the Draft EIR because it would not be visible due to landscaping and the eastern viewpoint of the section.

The existing 76-ft-high hospital building would block views of the proposed new construction from Buena Vista Park. As a result, the townhouses would not block any eastward views from Buena Vista Park that the existing hospital does not already block. From the lower slopes of Buena Vista Park (below the 510 elevation) views to the east are blocked by the existing hospital building. Buena Vista Park crests at elevation 575 (see Figure 14a on p. 149). At this elevation there are unobstructed easterly views of the Castro and Upper Market neighborhoods, Market St. and of the Downtown. If built, the townhouse structures would not affect such views. A view from a point in the Park north of the hospital looking south, parallel to Park Hill Ave. could be interrupted by the new construction.

An additional photograph of the project model has been included as Figure 3a in the EIR (see p. 159); this photograph includes all of the residences on Park Hill Ave. opposite the project site and shows the comparative height and scale of the new construction and the existing residences. Because of the bend in the roadway on Park Hill Ave. and the east-west orientation of the new construction it is not possible to show in a single photograph of the model all of the homes on Park Hill Ave. as well as the upward slope of this street. A view of the model which shows the relative height of the new construction and the existing houses is also constrained because of the inevitable downward angle of a model photograph makes it difficult to perceive topography. Figures 8 and 8a, on pp. 101-102 also show the relative scale of the new construction and the residences on Park Hill Ave.

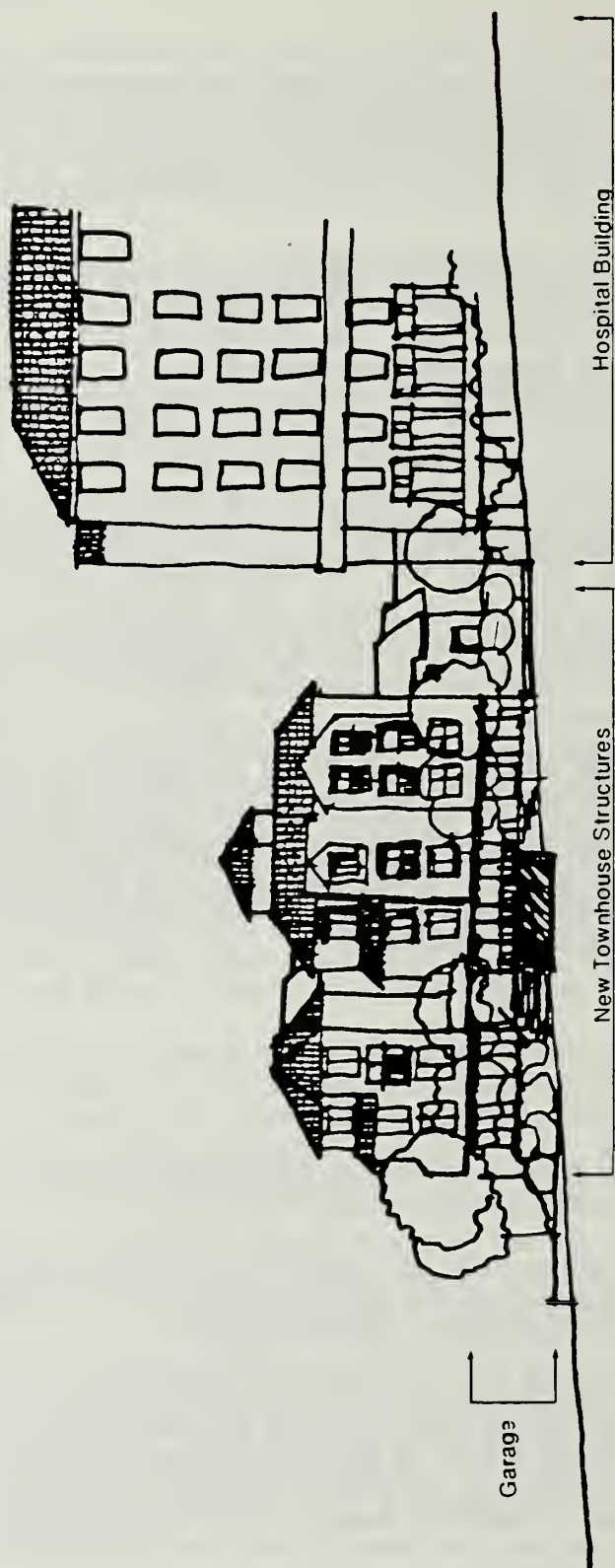
d. Architectural Quality

COMMENTS

"After I reviewed the EIR Draft, it became clearer and clearer that the sponsor only provided the community with more uninformed notions about the project.

"Clearly, the project is out of scale with the existing fine and diverse residential architecture of the area. It is unrelated to the neighborhood. The site itself is poorly organized, and it is a mix of unrelated buildings." (Michael Immel)

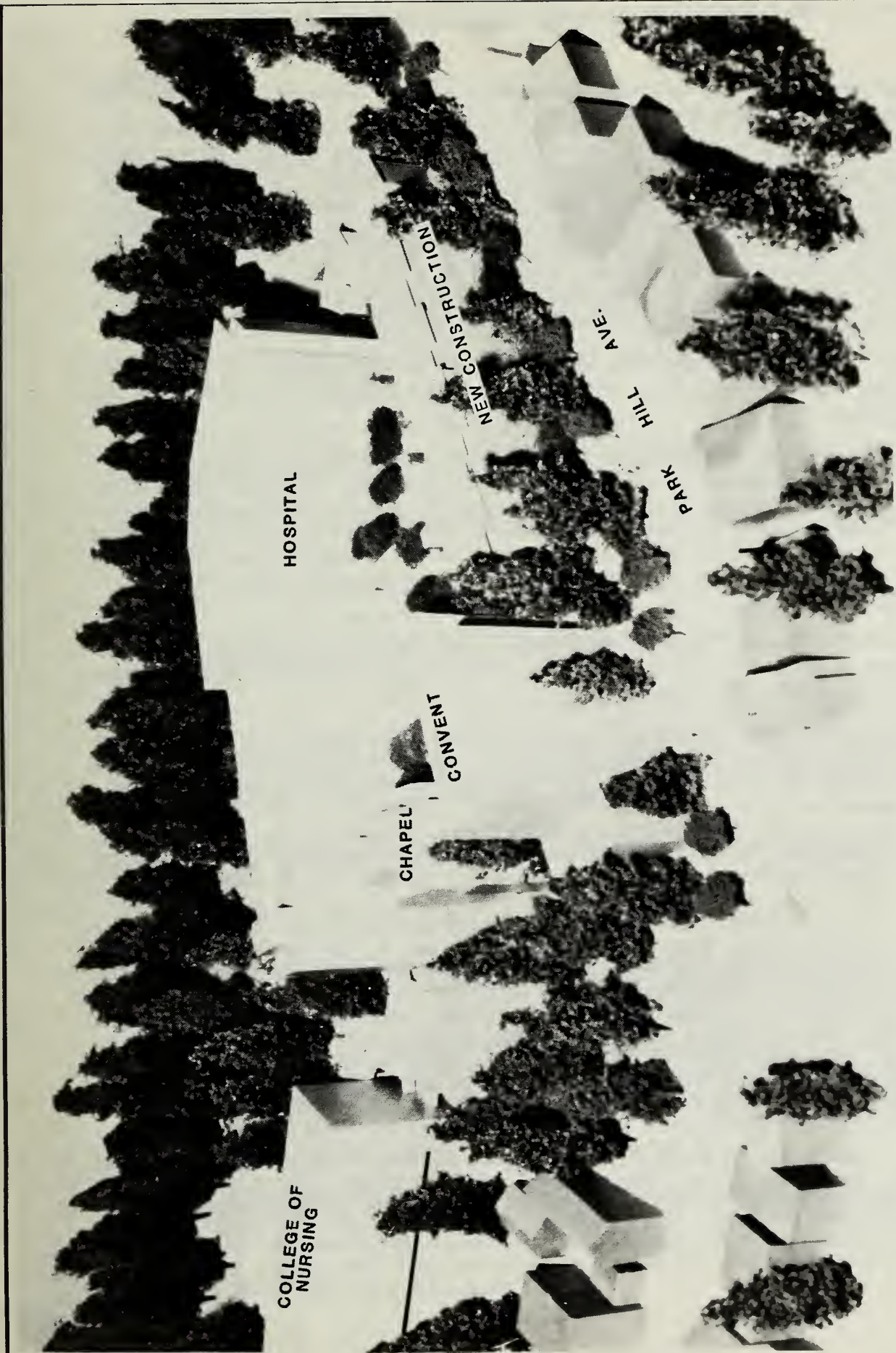
"In Fig. 8, page 19, the sponsor has shown a sectional drawing. But the section goes through only the lowest part of the new construction. The four-story new construction -- the most critical scale problem -- is not shown. It also fails to show the existing grade for comparison purposes. In Fig. 17, 17a, 18, 18a, pp. 42-54 again only the lowest new construction is depicted. These photo sketches should also be done for the Park Hill - Buena Vista East intersection where the new work is twice the size depicted in these figures." (CRD, p. 48 and Michael Immel)



0 25
FEET

FIGURE 7a: West Elevation (Facing Buena Vista Ave. East)

SOURCE: Kaplan/McLaughlin/Diaz



11-111 The placement of trees on the model is conceptual and does not represent the actual heights, or dimensions, of proposed or existing trees on the property.

FIGURE 3a: Photograph of Project Model
Looking Southwest

SOURCE : Kaplan/McLaughlin/Diaz

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"The critical new four-story, and with the parking garage, five-story structure at the corner of Park Hill and Buena Vista East, there is no section." (Michael Immel)

"In addition, again ignoring the scale of the neighborhood, the developer proposes to landscape the new construction "to further remove the new construction from views from nearby residences", choosing to separate them from the fabric of the neighborhood rather than make any attempt at integration - physically, architecturally or socially. Judging from Fig. 7 the style of the new construction appears to be "Bogus Mission Revival" more than "Spanish Renaissance Revival"; the creation of a huge new mass of mediocre buildings in a neighborhood of distinguished architecture in a wide variety of styles is insulting and arrogant to the scale and character of the neighborhood." (CRD, p. 52)

"Draft EIR p. 1 -- New construction is described as two to four stories. The initial study said three and four stories (EIR p. 104) [p. 227]. No explanation was given for the change." (CRD, p. 58)

"p. 17 -- Wouldn't two to four stories in a southerly direction creating a step effect down from the bulk of the convent be a better design? EIR states: 'The townhouse design would incorporate scale, texture, color and windows similar to those of the hospital complex buildings.' Please elaborate by quoting Sanger study: 'The convent is of low architectural quality . . . it is considered unattractive and poorly sited with respect to both the hospital building and residential building and residential buildings on the other side of Park Hill.'" (CRD, pp. 58-59)

"The hospital's so called 'Spanish Renaissance Revival' style is really a rather undistinguished building. Its 'Spanish' detailing is minor, and the general style more closely resembles a military barracks.

"The 'Renaissance' allusion stems from the fact that the major mass of the building "sits" on a two-story base defined in this case by a cornice line at the top of the second floor. On the park side of the building this line and the fact that the building bends around the corner mitigates the apparent mass and height of the structure. On the southeast side this is not the case. Because the entire mass of the buildings can be perceived at once, their effect is immense. The cornice line becomes insignificant and the building appears as a solid wall towering above. The fact that the roof is red tile is barely discernible.

"The effect of the Convent building taken alone is similar, as it rises the equivalent of more than 9 stories above Roosevelt Way. The Chapel, by far the most interesting building, would be completely blocked from view on Buena Vista East and Park Hill. The major factor mitigating the effect of the scale of the hospital building upon the neighborhood is that it does not face any homes on one side, and the other side is set back from Park Hill. The new construction, clearly under-represented and misrepresented in the EIR (figs. 7, 8, 17, 17a, 18, 18a), will effectively create a towering wall of earth-bermed parking garage and buildings along Park Hill, obviously disrespectful (of) "the scale of nearby residences", contrary to the proposed design." (CRD, pp. 51-52)

"I think . . . that is one of the things that I found missing in the EIR, was a careful description of that little chapel. The windows and the interior, I don't know if that's environmentally correct, but it is something I need to have in the EIR." (Susan Bierman)

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RESPONSE

The Spanish Renaissance Revival architectural style of the existing hospital, chapel and convent buildings does not necessarily "blend" into the surrounding neighborhood, but this style adds to the architectural diversity of the Buena Vista neighborhood. The proposed new construction, designed in a Mission Style, would complement, but would not be similar to, the existing hospital complex. A cross section of the highest part of the new construction has been added to the EIR as Figure 8a; see p. 102 of this document. Refer to the revised Figure 2, Site Plan, on p. 105 for the exact location of the cross section shown in Figure 8a. The townhouses would increase the visual mass and scale of buildings along Park Hill Ave. when viewed from the east. The scale of the new construction would be modified by a stepped roof design, a setback from Park Hill Ave., and the use, where possible, of existing trees and shrubs in front of the townhouses.

A west elevation which shows the parking garage structure and new construction at the intersection of Park Hill Ave. and Buena Vista Ave. East has been added to the EIR as Figure 7a (see p. 158).

The third sentence, second paragraph, on p. 40 of the Draft EIR is replaced with the following:

"The new construction would incorporate several design elements that are common to the Mission Revival Style such as round arches and red-tile roofs. These features would complement the existing hospital complex, built in a Spanish Renaissance Revival style."

As stated on p. 222 of the Draft EIR, the difference in the height of the new construction as described in the Initial Study and EIR is attributable to the more precise design information that was available during subsequent preparation of the EIR. The Initial Study was completed during the early stages of project planning when the design of the new construction was conceptual.

The following paragraph is inserted into the EIR after the second paragraph on p. 70a of the EIR:

"MEASURES NOT INCLUDED AS PART OF THE PROJECT

The new construction could be designed so that the two- to four-story buildings were stepped down in a northerly direction from the convent, instead of stepping down from the hospital building as proposed. This form of stepping would provide a transition in height and scale from the convent building. The project sponsor and architect have rejected this measure because they believe the proposed design would have fewer visual impacts on Park Hill Ave. near the convent building. The proposed design would step the townhouses down in a southerly direction so that most of the lower two- and three-story units would be opposite the majority of the homes on Park Hill Ave."

The new construction would block some existing views of the chapel from Park Hill Ave. Present views of the chapel from Park Hill Ave. and from Buena Vista Ave. East are limited because the chapel is located between the south end of the hospital building and the convent. The new construction would not affect existing views of the chapel from Buena Vista Ave. East.

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The following has been added after the second sentence in the second paragraph on p. 27a of the EIR:

"The chapel building contains two and a half levels: a lower set of store rooms proposed for conversion into four units, and a balconied or split-level main floor proposed for conversion into three units. The architectural value of the building lies in the chapel itself whose murals and interior space were designed by Bakewell & Brown. "The interior of the chapel is richly ornamented. It has a shallow central dome, half-round barrel vaults, and smaller concentric arches which contain stained glass windows on the north and south walls of the building. The western narthex supports a balustraded balcony. The chapel is entered from the main floor of the hospital building to the balcony or from the basement of the chapel through a vestibule with exterior doors to the narthex.

"The murals in the chapel appear to be painted directly on the plaster with which the entire chapel is surfaced. The main dome is a blue sky with three rings of stars centered on an eye symbol. Mural colors are muted tans, browns and terra cottas, with cream-colored sheep, white doves and muted blue and green accents. The floor of the aspe is marble. Stained and painted art glass fill two small round-headed windows at the rear of the balcony and the large windows in each transept./2/"

"A new note /3/ has been added to p. 30 of the EIR:

"Anne Bloomfield, Architectural Historian, letter, May 19, 1983."

The following has been added to the Visual Quality and Shadows Impact section, as the last sentence of the first (partial) paragraph on p. 46 of the EIR:

"Development of the chapel building into residential units would alter the interior of the chapel, including possible elimination of the murals (see p. 27a for a description of the murals)."

The following mitigation measures have been added to the Visual Quality and Shadows Mitigation section p. 70a of the EIR:

"MEASURES NOT PROPOSED AS PART OF THE PROJECT

- A complete, professional photographic record could be made of the chapel interior and donated to a local archive (e.g. San Francisco Archives at the Public Library, California Historical Society, or the Bancroft Library). In addition, black and white photographs could be added to the file of St. Joseph's Hospital's Nomination to the National Register of Historic Places, for eventual inclusion in the National archives. This measure would provide an historical record of the chapel prior to its alteration into residential units.
- The existing sanctuary space in the chapel building could be retained (not converted to three residential units) and could be used as a private community room by residents of the Park Hill Project. See Alternatives B and C for a discussion of a project alternative that would retain the chapel.

e. Historic Designation of the Site

COMMENTS

"p. 70 Please note that proposed reuse of this complex according to the Secretary of the Interior's Standards for Rehabilitating Historic Structures would minimize any adverse effect that conversion to housing may have on the buildings, in terms of their value as cultural resources." (Jonathan H. Malone)

"p. 79 -- Please elaborate on the unique architectural and historic value of the buildings." (CRD, p. 62)

"The proposal to have the site designated a Historic Site is not accurately described. St. Joseph's Hospital was not listed on the City's 1976 study of architecturally significant buildings; it is not a city or state designated landmark. Sanger refers to the hospital building as 'undistinguished' (p. 8) and, concerning the convent building which the developers also want to see designated, states: 'It is not the same architectural style or quality as the hospital building and is considered unattractive and poorly sited with respect to both the hospital building and residential buildings on the other side of Park Hill.' Thus, the historic designation scheme has little to do with the merits of the case and everything to do with significant tax credits which the developer would derive upon designation." (CRD, p. 56)

"... On page 11 of the Draft Environmental Impact Report, it mentions the tax credit under the 1981 Economic Recovery Act. According to the laws, the owner of the property has to hold the property for five years to get full credit -- I think it should be explained, how, if they are going to sell these as condominiums, how are they going to expect to take advantage of this? ...they cannot pass it along to the owner-occupied, because the tax credits do not apply to owner-occupied units. Are they going to sell them to investors who are going to use them as rental property? Are they going to hold them and rent them out? I think these questions should be answered in the Draft Environmental Impact Report." (Richard Rothman)

"p. 2: B. Environmental Effects. Please include an entry stating that retention and reuse of the former St. Joseph's Hospital, a structure determined eligible for the National Register of Historic Places, will enhance a cultural resource." (Jonathan H. Malone)

RESPONSE

The following paragraph has been added to p. 46 of the EIR, after the first partial paragraph:

"The conversion of St. Joseph's Hospital to housing would comply with the Secretary of the Interior's Standards for Rehabilitating Historic Structures; in the opinion of the Landmarks Preservation Advisory Board this would minimize the effects that residential conversion would have on the cultural resource value of the hospital complex."

As stated in the first paragraph on p. 11 of the Draft EIR, the project sponsor has applied for the St. Joseph's Hospital complex buildings to be certified as historic structures and placed on the National Register of Historic Places. Also as stated on p. 11, the California Historical Resources Commission has approved this nomination.

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The nomination form for the National Register of Historic Places states:

"The building deserves recognition not only as an example of a fast-vanishing era of hospital construction, but also as one of the last major works by the very important architectural firm of Bakewell & Brown."

Of note, Bakewell & Brown designed San Francisco City Hall (1915), the San Francisco Pacific Gas and Electric Company Building (1925), and the rotunda of the late City of Paris Building (1908). The St. Joseph's Hospital complex has also contributed to the history of the City. The nomination form further states:

"The institution contributed . . . to the City's health care for 90 years. For the entire 90 years St. Joseph's accepted patients without regard to religion or nationality, the Franciscan Sisters always providing nursing and administration. For many years the hospital was also a home for the aged. Not only did the Sisters care for some patients on a charity basis, they kept general rates low by donating their nursing services, so that St. Joseph's was known as the working man's hospital. For nearly a year after the 1906 earthquake and fire the sisters of St. Joseph's Hospital fed several thousand homeless people without charge, costs partly born by the Red Cross." (Anne Blomfield, Architectural Historian, May 6, 1982 Nomination Form for the National Register of Historic Places Inventory completed for the Heritage Conservation and Recreation Service, United States Department of the Interior.)"

Nomination to the National Register of Historic Places is a state and federal process that is independent of the City's 1976 survey of architecturally significant buildings. Buildings which are not contained on the 1976 survey list can still be eligible for nomination to the National Register.

Page 8 of the John M. Sanger Feasibility Study provided the opinion that the convent is 'handsome, although undistinguished.' While it is true that the convent is generally considered to be of lesser architectural merit than the hospital and chapel, the history of all three buildings in the complex is closely interrelated. The potential historic designation was discussed in the context of the history of the site, and not as a merit of the proposed project. As stated on p. 11 of the Draft EIR, such designation could under certain conditions, (emphasis added) entitle the sponsor to tax credits under the 1981 Economic Recovery Act.

The sponsor is currently exploring alternative ways to take advantage of potential tax credits under the 1981 Economic Recovery Act. The Act requires that, in order for the owner to qualify for credits, the units be rented for a period of time. Currently, the sponsor is undecided as to how the proposed use of the hospital complex would satisfy the requirements of the Act. (Stephen R. Koch, Project Manager, Prometheus Development Company, letter, May 12, 1983.)

The following has been added to p. 46 after the new second paragraph, added by this document (see pp. 164-165):

"It is the opinion of the Landmarks Preservation Advisory Board that retention and reuse of the former St. Joseph's Hospital, a structure determined eligible

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for the National Register of Historic Places, would enhance the complex as a cultural resource."

The above insertion was not added to p. 2 of the Draft EIR because it is too detailed for the summary.

8. EFFECTS ON NEIGHBORHOOD PARKS

COMMENTS

IMPACTS ON BUENA VISTA PARK, CORONA HEIGHTS AND ADJACENT OPEN SPACE

"The proposed site is situated on the edge of Buena Vista Park. Access to the park closest to the hospital is very poor, and informal trails have been created to get into the park (see Sanger, p. 13). These foot trails have caused major erosion problems with great amounts of soil washing out into Buena Vista East during the winter months (see Sanger p. 13). The impact of vastly increased park use at precisely one of its worst points of access has not been evaluated. Similarly, there is no consideration of impacts on Corona Heights." (CRD, p. 44)

"My comments tonight relate specifically to the aspect of the Environmental Impact Report that discusses the impact on the park, which [discussion] is totally inadequate."

"... Buena Vista Park is [a] 44-acre park built primarily on sandy soil. In 1978, the community received some open space funds, approximately \$140,000, for use in Buena Vista Park. The community was primarily concerned with erosion control. Anyone living in the neighborhood using the park knows that erosion is really the most serious problem affecting the park at this moment. We did develop an erosion control plan. Eckbo-Kay Associates did the plan in conjunction with the community. We have put in a series of paths, but the primary area of erosion is on the south side of the park, across from St. Joseph's Hospital, and that entire section along the top portion of Buena Vista Park.

". . . You can imagine the impact of upwards [of] an estimated two to three hundred and fifty new residents on this park. There are no paths other than two -- one in the corner going up from Duboce up into the park, and one completely around the other side for access into the park. So we can envision a situation where the new residents in the central hospital complex would be going up literally no paths at all, which is one of the reasons that we have extreme erosion on that side of the park. . . . On the basis of the statements about Buena Vista Park, there really needs to be a much more serious study done about the environmental impact on the park. The City has already spent \$140,000, and it is really a waste of money not to consider what the implications of such a huge project would be on this . . . important area of the City." (Isabel Wade)

"Less solitude and more erosion and litter will occur not only at Buena Vista Park, but at other very fragile parks and open spaces in the general area, like Tank Hill, the Vulcan Stairs, Corona Heights, which is already skin-to-skin with sunworshippers on weekends." (Greg Gaar)

"Specific plans should be developed to protect Buena Vista Park and open space area at the corner of Park Hill Ave. and Roosevelt Way." (Pauline A. Layer)

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"The draft EIR notes that the proposed project will cause significant impact on the use and waiting times at area tennis courts. The mitigation measures proposed in p. 72 are inconsequential as they do not address future residents' desire to play tennis. We therefore request that the EIR include as mitigation measures the construction of on-site tennis courts plus the provision of night lighting for existing tennis courts at Buena Vista Park, States Street and Corona Heights." (CRD, pp. 44 and 45)

RESPONSE

Page 63 of the Draft EIR contains a discussion of the erosion control problem that exists at Buena Vista Park and possible increases in erosion as a result of increased usage of the park by project residents. The closest formal path entrance leading into Buena Vista Park from the project site is about 300 ft. from the northeast corner of the project. It is not possible to estimate the number of persons from the project who would use formal or informal pathways; therefore it is not possible to estimate the amount of erosion that would be attributable to project residents. A mitigation could be added that would require the project sponsor to pay for the installation of a formal pathway into Buena Vista Park directly across from the project site. The following mitigation measure has been added to p. 72 of the EIR under MEASURES NOT INCLUDED AS PART OF THE PROJECT:

"As a condition of project approval, the City Planning Commission could require the project sponsor to contribute money for the installation of a path or stairs into Buena Vista Park directly across from the project site. This measure would encourage project residents to use a formal path instead of using informal paths, thereby minimizing increased erosion problems at the park. Implementation of this measure would have to be approved by the San Francisco Recreation and Park Department; implementation should also be coordinated with the Friends of Buena Vista Park."

Since the City has already conducted a study of the park, it is not necessary for the EIR to duplicate those efforts. The first two paragraphs on p. 63 of the Draft EIR contain a discussion of increased recreational demand that would result from the project. As stated on pp. 63-63a, of the Draft EIR, the project would increase demand for neighborhood park space by 0.75 acres. This increase in demand would be distributed to all neighborhood parks including Corona Heights. It is not possible to separate the increase in demand among individual parks in the neighborhood. The project would include about 20,100 sq. ft. of on-site open and recreational space. If used by project residents, the on-site open space would decrease some of the additional demand that project residents would have for neighborhood parks (see the first mitigation measure on p. 72 of the Draft EIR).

The Draft EIR acknowledges on p. 63a that the project would result in a longer wait for tennis players now using courts, particularly the two courts in Buena Vista Park. The EIR does not state that this effect would be significant.

The project sponsor has rejected the mitigation of providing on-site tennis courts because the current site plan would not allow sufficient space for a standard-sized tennis court which is 36 ft. by 74 ft. The sponsor has agreed to provide funds to provide night lighting of tennis courts at parks in the project vicinity. Providing

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night lighting at these courts would increase the amount of playing time available at these courts, and therefore, would allow potentially more people to play tennis and possibly reduce waiting time. An increase in nighttime tennis players could increase public safety problems at the parks in the Buena Vista neighborhood.

The following mitigation measures have been added to pp. 72-72a of the EIR:

"MEASURES NOT INCLUDED AS PART OF THE PROJECT:

- "- The project sponsor could contribute money to the San Francisco Recreation and Park Department to be used for night lighting of tennis courts at public parks within the project vicinity. This measure would increase the amount of time when it would be possible for residents to play tennis, and therefore could reduce waiting times at the courts by spreading the use of the courts over a greater period of time. This measure has been rejected by the sponsor because such lighting could cause glare on nearby homes and because the light standards would be visible from off site. The sponsor also rejects this measure because night lighting could increase the potential for crime to the extent additional people used the courts at night.
- "- The sponsor has rejected a mitigation measure that would provide a tennis court on-site, or in existing parks. The proposed site plan does not allow for sufficient space to build a tennis court. Provision of a tennis court on site could cause glare effects on nearby homes, if lighted. A standard-size tennis court requires a 120 ft. by 60 ft. area."

The open space area at the corner of Park Hill Ave. and Roosevelt Way consists of four parcels which are currently owned by St. Joseph's Hospital. Those parcels (Lots 15, 16, 17, and 18) are not part of the proposed project, nor are they included in the sponsor's interests.

9. ENERGY

a. Energy Efficiency

COMMENTS

"p. 65 -- If gas is more efficient than electricity, why is electricity contemplated? How about an analysis of systems over the life of the project?" (CRD, p. 61)

"In view of the technology available to assess cost effectiveness of energy conservation measures, the all electric approach and the virtually complete lack of application of existing energy conserving technologies on the part of the developer, the measures listed in the EIR on page 73 should be required for analysis by the City Planning Commission."

"Because natural daylight is only minimally utilized in the interior spaces, energy use will be high and the most costly energy form is being used - electricity. On page 65 natural gas is cited as a cheaper energy source but electricity is planned for the building, why? Solar energy should be a stronger consideration in planning for any new units to improve

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the total environmental design and quality of this project for more than its 30-year life, increase natural interior illumination, exterior shading devices, economize air conditioning system and computer monitoring systems for HVAC and lighting (p. 73, EIR Draft)." (CRD, p. 50 and Michael Immel)

RESPONSE

Natural gas was not contemplated because the existing structures do not have a natural gas distribution system. An analysis of natural gas versus electrical systems over the projected 30-year life of the project would demonstrate that natural gas is the more economical energy source. PGandE's 1980 lifeline rates for electricity and natural gas were 1.69¢/kWh and 27¢/therm, respectively. Converted to equivalent units of thermal energy, these costs are 0.51¢ and 0.27¢/thousand Btu, respectively. Therefore, for applications such as space heating, natural gas would be more economical. Over the life of the project, this would outweigh the higher first cost of natural gas.

Retrofitting the existing structures for a natural gas distribution system would be expensive and problematic. Reasons for an all-electric design are cost, reliability, and health concerns. The first-cost of installing electrical distribution systems and appliances is less than that of natural gas. Electricity is produced from a variety of energy sources (hydroelectric, oil, coal, nuclear fuels, natural gas, biomass, solar), so it is inherently more reliable over the long term than natural gas supply. Finally, use of natural gas indoors causes substantial indoor air pollution, whereas use of electricity does not.

Active solar energy is probably more economical than electrical energy for certain applications, such as space heating, over both 30-year and 50-year assumed project lives. Solar energy applications have been identified as measures to mitigate the energy impacts of the project (see p. 73 of the Draft EIR). If found to be feasible, the City Planning Commission could require that solar energy applications be included in the project as a condition of project approval.

The energy-efficient design measures referred to by the commenters are listed, along with other measures, as "Measures Under Consideration" on p. 73 of the Draft EIR. A preface to this list of energy mitigation measures states that the City Planning Commission could impose these measures on the project sponsor as a condition of project approval.

b. Insulation

COMMENTS

"The only mention of the actual building construction, "concrete floors and heavy exterior wall construction" (EIR, p. 64) fails to mention how well insulated the existing exterior walls are. The construction data would suggest that the walls are probably poorly insulated; if true, the application of an insulating skin over the "heavy exterior" walls might provide an enormous amount of heat retention as an important aspect of conserving energy." (CRD, p. 53)

"An additional requirement should be the investigation of insulation to the exterior of the existing buildings." (CRD, p. 53)

RESPONSE

Exterior insulation would enhance the energy performance of existing buildings. The following is added to the list of mitigation measures at the bottom of p. 73 in the EIR:

"- Exterior insulation on existing buildings;"

Exterior insulation would take the form of adhesive material, wood or a synthetic polymer, which would insulate the building. Without knowing the specific materials and treatment that would be used, it is not possible to determine the effects on visual quality or historic designation of the site.

c. Nuclear Energy

COMMENT

"Page 38. It is about nuclear energy again. And it is a good description of the question as to whether Washington State can provide it, since they aren't having much luck getting some of their facilities approved, as is the case here. I would like PG&E to answer a question; can they provide the necessary energy for this project without nuclear power?" (Susan Bierman)

RESPONSE

Pacific Gas and Electric Company (PG&E) has not purchased power from Washington state nuclear power plants in the past, nor does it anticipate doing so in the future. PG&E purchases excess hydroelectric power from utilities in the Pacific Northwest and plans to continue doing so through existing long-term contracts with these utilities (Mr. Richard A. Davin, Coordinator of Nuclear Information, Pacific Gas and Electric Company, telephone communication, April 22, 1983).

PG&E currently obtains 4.6% of its base load requirement from nuclear power plants, including purchases of nuclear power from Rancho Seco through the Sacramento Municipal Utilities District. With the addition of nuclear power from Diablo Canyon beginning in the next 12-18 months, this percentage will increase. Projections of power supply for the PG&E service area through the year 2000 include the following percentages of nuclear power: /1/

<u>1985</u>	<u>1990</u>	<u>1995</u>	<u>2000</u>
15%	14%	21%	17%

It is unlikely that PG&E or the utilities with whom it contracts for additional power, would entirely discontinue nuclear power generation within the useful life of the project. The demand for additional energy by a single project in San Francisco would not itself trigger the construction or cancellation of new nuclear power facilities.

/1/ PG&E, 1982, Forecast of the Demand for Electricity within the PG&E Service Area, 1982-2002.

10. EXCAVATION, FOUNDATION, STRUCTURAL

COMMENT

"-- What indication is there that the 16-ft. convent addition would bring that building into conformance with seismic standards?" (CRD, p. 60)

"Excavation for the subsurface parking garage may pose serious foundation problems for the adjacent hospital, convent, chapel and the kitchen. How have recent heavy rains affected subsurface geology at the site? Excavation will also threaten the mature trees along Park Hill. Any new construction should be well outside the dripline of existing trees." (CRD, p. 51 and Michael Immel)

RESPONSE

A shear wall is a wall which is designed to resist forces resulting from earthquakes and to provide support to outer walls to which it is connected.

According to a licensed structural engineer/1/ the 16-ft. wide addition to the west wall of the convent would provide the following structural improvements that would bring the convent into conformance with seismic standards:

- 1) a new concrete shear wall running north-south would be constructed in conjunction with another new wall located within the existing building. These walls would resist seismic forces in a north-south direction;
- 2) Four new concrete walls would be constructed running east-west. These walls would be designed to resist all of the stresses anticipated to be generated by forces in this direction. Stresses would be transmitted from the existing convent structure to the new addition by connections made at the floor lines. These connections would make the existing building and addition tend to act as one structure during an earthquake, adding to the earthquake resistance of the weaker, older convent building.

Before starting excavation, steel sheet piling /2/ would be driven between the parking structure walls and the existing buildings. As the excavation pit is deepened, horizontal braces would be installed to support the sheet pilings. These braces would be anchored to rock at intervals of ten feet, both horizontally and vertically. Rock anchors would be grouted into the bedrock underlying the existing building. This procedure would both assure general hillside stability and reduce to a minimum the possibility of settlement of the existing building. (Peter Culley, California license No. SE1969, President, Peter Culley & Associates, Consulting Structural Engineers, letter, May 16, 1983)

The site is in an area mapped as having potential hazards from landsliding,/3/ however, no landslides have occurred on the site during the recent heavy rains. These rains could have temporarily raised the groundwater level below the site, and resulted in greater subsurface flows to springs and seeps. It is unlikely that these storms significantly reduced the subsurface stability of the site. Foundation preparation would be conducted under active supervision of soils engineers who would monitor soil

conditions prior to construction. (Peter Culley, California license No. SE1969, President, Peter Culley & Associates, Consulting Structural Engineers, telephone conversation, June 10, 1983). See also section I. SITE AND FLOOR PLANS, d. Landscaping and Open Space, pp. 107-108 for a discussion of the effect of the new construction on existing trees.

NOTES - Excavation, Foundation, Structural

/1/ Peter Culley, California license No. SE1969, President, Peter Culley & Associates, Consulting Structural Engineers, letter, May 16, 1983.

/2/ Steel sheet pilings are sheets driven into the earth that provide a tight wall in the excavation pit to resist the tendency of adjacent earth or other materials to collapse into the pit.

/3/ San Francisco Seismic Safety Investigation, June 1974.

11. GROWTH INDUCEMENT

a. Zoning Reclassification

COMMENTS

"The draft EIR does acknowledge the neighborhood's principal concern that 'the project could encourage rezoning of adjacent areas to a higher density such as RM-2 because the higher density district on this site (i.e., St. Joseph's complex) could be extended without resulting in spot zoning,' (EIR p. 69). However, it describes the precedent-setting nature of the proposed rezoning in much too limited terms. Several non-contiguous big lots where old houses now stand could also come under similar pressure in the future. While the draft EIR does acknowledge the precedent-setting dangers of rezoning the St. Joseph's site, it also makes a totally contradictory statement in the same paragraph: 'The project would probably not encourage additional residential development.'

"How the project could encourage rezoning of adjacent areas to a higher density but not encourage additional residential development defies logic." (CRD, p. 7)

"— Contradictory statement: would not encourage new construction, but would encourage rezoning." (CRD, p. 58)

. . . "The project would probably not encourage additional residential development as the surrounding neighborhood is already predominantly residential and potential nearby development sites are limited." This sentence, to me, is totally contradicted in the very next paragraph after that statement, which states that if this upzoning were allowed, then as many as 102 more units could be developed next door to St. Joseph's." (Greg Gaar)

"Other lots adjacent to the proposed development which are owned by the Sisters of St. Joseph have not been clearly identified and should be shown on a lot and block map. These may well be subject to upzoning at a later date, as previously discussed.

"The neighborhood is extremely concerned that intensive development of these other lots will eventually add to the impact of a hospital complex conversion. Mitigation measures to address this serious problem should be included in the EIR." (CRD, p. 44)

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"p. 69 — Please define spot zoning." (CRD, p. 62)

"-- What assurance is there that other lots owned by St. Joseph's will not be developed to RM-2 capacity?" (CRD, p. 62)

RESPONSE

The first sentence on p. 69 of the Draft EIR states: "The project would probably not encourage additional residential development as the surrounding neighborhood is already predominantly residential and potential nearby development sites are limited." This sentence refers to the potential for new residential construction on existing lots under the current zoning, i.e. no higher density zoning reclassification would occur. The Draft EIR acknowledges that if the project site were to be rezoned, the rezoning of adjacent areas to a higher density, could be encouraged. To clarify this discussion, the first paragraph on p. 69 of the Draft EIR has been replaced with the following:

"The project probably would not encourage new residential construction on existing lots under existing zoning because nearby potential development sites are limited and there is minimal incentive to replace existing structures with higher density structures on lots which are not developed to the maximum density permitted. However, if rezoning of the project site were to occur, this could encourage rezoning of nearby areas to higher densities, and additional residential development could occur."

The following sentences have been added to the beginning of the second paragraph on p. 69 of the Draft EIR:

"The project could also set a precedent for reclassifying the College of Nursing and several adjacent vacant lots which are owned by St. Joseph's Hospital to a higher density than the existing RH-2 district (see Figure 1, p. 10). The project could encourage rezoning of these parcels to the RM-2 district because the higher density district of the project site could be extended to these adjacent parcels without resulting in spot zoning."

Vacant adjacent lots that are owned by St. Joseph's Hospital are shown in Figure 1 on p. 12 of the Draft EIR. The second sentence on p. 69 of the Draft EIR states that these lots are currently owned by St. Joseph's Hospital and refers the reader to Figure 10. (This sentence has been replaced by the response noted on p. 172). To further clarify this point, the phrase "Vacant Lots owned by St. Joseph's Hospital" has been added to the bottom of Figure 1 on p. 10 of the EIR.

Spot zoning refers to classification of single, non-contiguous parcels to a zoning district which is not the same as similarly situated parcels, without adequate justification for different treatment such that it gives a single landowner or small group of landowners a constitutionally unwarranted unequal treatment. Technically, spot zoning is defined by the courts on a case-by-case basis. Historically, this type of zoning has resulted in development of incompatible uses.

There is no assurance that lots owned by St. Joseph's hospital (Lots 15, 16, 17, and 18) would not be rezoned to RM-2. These parcels are not part of the proposed project and are not within the project sponsor's control. As stated on p. 69 of the Draft EIR, reclassification of the vacant parcels owned by St. Joseph's Hospital to RM-2 could

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result in development of 26 units or up to 40 units with a PUD designation. Any future development proposal for these parcels would be subject to environmental review and approval by the City Planning Commission.

b. Density

COMMENTS

"Page 68 -- Comparison should be restated: Proposal would be 285% density of existing RH-2 neighborhood". (CRD, p. 61)

"The matter of increased density is a slightly recurring theme in the draft, so stated as to imply that we are sinning in not developing all City property to its maximum capacity." (Dorothy Campbell)

RESPONSE

The last sentence in paragraph four on p. 68 of the Draft EIR has been changed to:

"The unit density of the project would be 285% of the density permitted by the existing RH-2 district (within a 300-ft. radius); 222% of the density permitted by the RH-3 district; and about 108% of the permitted RM-1 district density."

Density is discussed in the Draft EIR in Chapter IV E, Growth Inducement, (pp. 68-69) and Chapter IX, Alternatives (pp. 79, 81, 83, and 87). Those discussions of density primarily compare the density of the project to the density of the existing neighborhood within a 300-ft. radius. In each of these discussions the EIR acknowledges that the unit density of the project would be higher than the existing zoning districts within a 300-ft. radius. In the fourth paragraph on p. 68 of the Draft EIR, the third sentence states: "These [zoning] districts [within 300 ft. of the project site] are not developed to the maximum density permitted by the City Planning Code." This sentence is intended to clarify that the project zoning was compared to the actual density of the existing neighborhood and not to the allowable density of each zoning district.

12. ALTERNATIVES

a. Demolition of Existing Buildings

COMMENTS

"p. 6 -- Alternatives should be compared to existing zoning, not this hypothetical proposal. This flawed methodology is used throughout." (CRD, p. 58)

"Since the original historic form of the individual structures and the overall complex would be severely disrupted by partial demolition [the convent], we do not think this answer to questions of urban design or density is sensitive to the character of the original design by architects Bakewell & Brown." (Grant Dehart)

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"p. 78 Alternative A. Demolition of existing buildings would adversely affect the environment in that the former St. Joseph's Hospital, a National Register eligible property, would be removed as a cultural resource." (Jonathan H. Malone)

"If Alternative A is adopted, the genuine environmental impact on the traffic and shadow situation would certainly be no greater than it was when the hospital operated." (John Lavrich)

RESPONSE

Section 15143 (c) of the CEQA Guidelines, requires that alternatives be compared to the proposed project. Therefore the alternatives analysis must necessarily be a comparison of the impacts of each alternative to the impacts of the project.

The proposed project would retain all existing buildings, including the convent. Alternative A as discussed on pp. 78-79 of the Draft EIR would demolish all buildings and subdivide the site into 44 single-family lots, a total of 88 two-story units.

The following has been added as the first sentence of the third paragraph on p. 78 of the EIR.

"Alternative A would demolish the former St. Joseph's Hospital complex, a property eligible for the National Register of Historic Places. In the opinion of the Landmarks Preservation Advisory Board, demolition of the complex would remove a cultural resource from the City."

As the commenter states, traffic impacts would be less than when the hospital was in operation, if the existing buildings were to be demolished and 88 new units built. The two-story, detached units would also cast shorter shadows than the hospital building.

b. Use of Existing Buildings Only

COMMENTS

"The EIR should identify Alternative B as the neighborhood alternative. It was included in the EIR at the specific request of neighborhood residents (see Hooper letter to Rosetter of 12/9/82). Alternative B should also be described as establishing the maximum number of units which would be permitted under the existing RH-2 zoning." (CRD, p. 8)

"The neighborhood alternative, Alternative B, requiring that the project be confined to existing zoning, would still permit a conversion of the hospital complex into 109 units. This would be almost three times bigger than any other buildings on Buena Vista Park (75 Buena Vista East has 37 units and 555 Buena Vista West has 41 units). It would also have a much higher unit density than the RH-2 neighborhood: 45 units per acre vs. 28 units per acre (EIR pp. 68 and 81). This data should be included as part of the description of Alternative B." (CRD, pp. 8-9)

"Page 80. In discussing the one level of surface parking where it is an alternative where you would not have housing there, and they are talking about just a parking lot, where the

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parking is now, and it says there would be no environmental impact. But the first level would be a structure. There must be some kind of impact from a one-story parking structure there. We need to know whether that one-story parking structure would affect the view from the park at all." (Susan Bierman)

"... none of the alternatives seem to address a project that would provide tennis courts. It would seem to me that somewhere in here, with all the discussion about the crowding -- people are waiting an hour, two hours for tennis courts, and this is going to be an enormous project, enormous number of people to bring in. And the developer never once addresses the possibility of putting tennis courts on his own property. And I think that ought to be discussed. I have the perfect place for it. It is where the new construction would be. (Susan Bierman)

"We urge you and the Planning Department to maintain the interior spaces of the chapel intact rather than allow them to be subdivided into dwelling units, which would destroy much of the special character of the structure and its architectural details. Michael [Corbett] reported that the chapel, with its domed interior, its beautiful stained glass windows, its chandeliers and its altar, religious statuary and other furnishings is the finest part of the hospital complex. The quality of design and craftsmanship in the chapel is unusually high, particularly considering its late date. Indeed, although little known, the chapel may be one of the most distinguished examples of religious architecture in San Francisco. This building would be more appropriately used for some community or religious purpose which would be consistent with the Secretary of the Interior's standards." (Grant Dehart)

"p. 82 -- What would be wrong with larger units? A variety of sizes would be much more closely similar to the surrounding neighborhood." (CRD, p. 62)

"We call for no rezoning, two off-street parking spaces per unit, no new construction, and preservation of open space at the corner of Park Hill Ave. and Roosevelt Way. We believe the standards will preserve the quality of life currently enjoyed by Buena Vista neighborhood residents, and that anything else would be an infringement of their rights." (William Andrews)

"Apparently, the Prometheus Development Co. in addition to asking for a zoning change also wants to add significant new construction. We again support the neighborhood's position to limit the project to the conversion of existing buildings.

"... One of the basic issues at stake is the rezoning of this property. Retaining the existing zoning of RH-2 would still allow 109 condominiums to be built. If the property is allowed to be rezoned it would drastically change the character of this neighborhood and could set a dangerous precedent for the future." (Pauline A. Layer)

RESPONSE

To acknowledge the neighborhood's support of Alternative B, the following has been added at the end of the first paragraph on p. 80 of the EIR:

"Alternative B is supported by the Buena Vista Neighborhood Association and was included in the EIR at the request of neighborhood residents."

Table 2 on p. 77 of the Draft EIR shows the "Total Allowable Units" for RH-2 zoning with and without a PUD as 109 and 88 units, respectively.

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The fourth paragraph on p. 81 of the Draft EIR has been revised as shown below:

"Alternative B would provide 109 housing units on the site, the maximum number allowed under the existing RH-2 district. The unit density for Alternative B would be about 45 units per acre. This density would be 35 fewer units per acre than that of the proposed project, and 17 units more than the actual density in the RH-2 district within 300-ft. of the site."

Alternative B would provide 109 units with two parking spaces for each residential unit, a total of 218 spaces. The description of Alternative B in the third paragraph on p. 80 of the Draft EIR states that parking would be constructed on three levels, two of which would be underground. The first level would be at the surface elevation (405 ft.) and would contain about 70 parking spaces; The surface level parking would not be enclosed in a structure. As discussed in the fifth paragraph on p. 81 of the Draft EIR, a variant to Alternative B would be to provide more than 109 units on site with two parking spaces per unit. Provision of more than 220 parking spaces would require construction of a one-level parking structure above grade (in addition to the one surface level and two subsurface levels of parking).

The fifth paragraph on p. 81 of the Draft EIR has been revised as shown below:

"ALTERNATIVE B: VARIANT

"Alternative B could also develop more than 109 units on-site with two self-park parking spaces provided for each unit. Approximately 150 units could be developed with 300 parking spaces. However, provision of more than about 220 parking spaces would require construction of a one-level parking structure above grade. The parking structure would be constructed along Park Hill Ave., in the area planned for the new townhouses in the proposed project. This structure would be about 10-15 ft. in height and contain four levels of parking, two of which would be underground. There would be one level of parking at ground level, and another at one level above grade, in addition to the two subsurface parking levels. A one-level parking structure would have fewer visual impacts than would the new construction as the structure would be shorter than the existing houses on Park Hill Ave. and would be almost fully screened by the existing landscaping. A one-level parking structure also would not affect views to the east from Buena Vista Park.

"A parking structure could alter the residential character of Park Hill Ave. The one-level parking structure would have negligible shadow impacts on the sidewalks and roadway of Park Hill Ave.; shadows from the structure would not extend onto residences or sideyards."

The current site plan would not accommodate a regulation (standard) size tennis court which requires a total area of 120 ft. by 60 ft. The following has been added to the end of the third paragraph on p. 80 of the Draft EIR: "A tennis court could be constructed on top of the surface-level parking. This would eliminate a 15-ft.-wide area along the eastern edge of the interior driveway."

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The last sentence in the second paragraph on p. 81 of the EIR has been replaced with the paragraph below:

"An estimated 40 to 45 project residents would be tennis players. As Alternative B would provide a tennis court, impacts on the waiting times at nearby courts would be minimal. The deck of the tennis court would be about 10 ft. above the ground-level parking area. An 8-to 12-ft.-high mesh screen or fence would be required to enclose the court. The tennis court deck and screen above the surface-level parking would be about 22 ft. high, 4-22 ft. lower than the new construction proposed for the project. If night lighting is proposed for the courts, glare from the lights could affect the residents on Park Hill Ave. opposite the site."

A new footnote /3/ has been added to p. 86 of the EIR:

"/3/John Wiley, 1981, Architectural Graphics Standards, 7th Edition."

The present footnotes /3/, /4/, and /5/ will become /4/, /5/, and /6/, respectively.

The project sponsor is currently considering the possibility of retaining the sanctuary of the chapel for nonresidential use. The lower level store rooms and ancillary space would be converted into four residential units. (Stephen R. Koch, Project Manager, Prometheus Development Company, letter to Buena Vista Neighborhood, June 3, 1983). This would eliminate three units in the proposed project. The sanctuary could be used for community or recreation activities by the Park Hill project residents. The discussion of Alternative B on p. 80 of the EIR (last sentence, first paragraph) addresses retaining the entire chapel structure for a non-residential use.

Several structural constraints preclude the development of efficient larger units. The units tend to extend lengthwise along the building because of the double-loaded corridors and the width of the building. To develop larger units, internal corridors or stairways would have to be included in each unit resulting in substantial amounts of unused floor areas (Stephen R. Koch, Project Manager, Prometheus Development Company, letter, May 12, 1983).

Alternative B analyzes an alternative to the proposed project that would not require a zoning reclassification or entail new residential construction along Park Hill Ave. The City Planning Commission will consider the neighborhood's support for Alternative B as part of its deliberations on the project.

See also the response in Section 11. GROWTH INDUCEMENT, a. Zoning Reclassification for a discussion of how the project could affect the existing character of the neighborhood or establish a precedent for rezoning nearby parcels.

c. RH-3 District Alternative

COMMENTS

"The EIR offers an inadequate range of alternatives to compare to the proposed project. Specifically, it fails to develop an alternative which would coincide with an upzoning of

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one increment to RH-3, a step which would then permit the construction of 137 units. Why was this alternative ignored?" (CRD, p. 54)

"p. 77 — Why wasn't RH-3 developed as an alternative?" (CRD, p. 62)

"p. 87 -- How about an examination of RH-3." (CRD, p. 62)

"Page 7 or 8, the Alternative Section, it is interesting to me . . . and puzzling . . . that there is no alternative for RH-3 and also for RH-3 planned unit development. If there is, I didn't find it. RH-3, there is RH-3 on Buena Vista East from Upper Terrace to the Nursing Home. And why that isn't discussed, I find puzzling, and think it needs to be given a very careful description.

Giving only the description of RH-2 Planned Unit Development, which is 109 units, doesn't give us enough leeway. To jump from that to RM-2 with a planned unit development is a pretty good shift, and it is a lot for a neighborhood to cope with. So, please do both those alternatives, RH-3 and RH-3 PUD." (Susan Bierman)

RESPONSE

The following new alternative has been added to the EIR as Alternative C on p. 82-82a of the EIR:

"ALTERNATIVE C: USE OF EXISTING BUILDINGS ONLY (ONE PARKING SPACE PER UNIT)

"DESCRIPTION

"In this alternative, the existing hospital and convent building would be refurbished into a total of 137 units; no new construction of residential units would occur along Park Hill Ave. The chapel would be maintained for non-residential use and could be used for community or recreational activities by the residents of the Park Hill project.

"Alternative C would require a zoning reclassification to RH-3, as well as a Conditional Use authorization for a Planned Unit Development (PUD) for development of up to 27 units more than the 110 units that would be allowed in an RH-3 district without a PUD. Alternative B analyzes 109 units, which is one unit fewer than the number permitted in an RH-3 district without a PUD. Therefore, the analysis of Alternative C includes only an RH-3 district with a PUD authorization.

"This alternative would provide one self-park parking space for each unit, a total of 137 parking spaces. These spaces would be provided on two levels. One underground level would provide 79 spaces at elevation 395 ft. along Park Hill Ave. with an exit/entrance at the same location as for the project. The second parking level would be at surface level, decked over the parking level at the 395 ft. elevation, and would provide 58 spaces with an exit/entrance east of the hospital building. The two parking levels would not be connected to each other.

"COMPARISON OF IMPACTS

"This alternative would not change the existing visual appearance of the site, as all existing buildings would be retained and no new construction would occur. The portion of the site proposed for surface parking in this alternative currently contains a parking lot. No new shadows would be cast on Park Hill Ave., because the townhouse structures would not be built.

"Traffic impacts would be about 30% less than those of the proposed project. Construction traffic would be less than that of the project which proposes 47 units of new construction. Assuming the same parking demand per unit as used to estimate project parking demand, total parking demand of Alternative C would be for 137 to 186 spaces.

"Alternative C would increase the population of the area by 205 to 240 persons. The demand for park and recreation facilities in the project vicinity would be 30% less than the demand of the proposed project. Recreation use of Buena Vista Park by project residents could contribute cumulatively to the wear on pathways and increased erosion, but the impact would be proportionately less than for the project. An estimated 50 to 55 project residents in Alternative C would be tennis players; these residents could contribute to increased waiting times for existing tennis players at local courts.

"Energy requirements for this alternative would be about 30% less than those for the project.

"Alternative C would allow development of 137 housing units on the site. The unit density for Alternative C would be about 55 units per acre, 25 units per acre fewer than for the proposed project."

As noted in the second paragraph of the new Alternative C discussion, RH-3 zoning without a PUD was not included in Alternative C because it would provide for 110 units, a condition almost identical to that described in Alternative B, which would provide 109 units (see p. 80 of the Draft EIR).

A variant to Alternative C has also been added to the EIR:

"ALTERNATIVE C: VARIANT

"This alternative could include the acquisition of some or all of the four adjacent lots owned by St. Joseph's Hospital (Assessor's Lots 15, 16, 17 and 18) and the development of some elderly/handicapped units. Further acquisition of the four lots would permit up to 152 units under a PUD within the RH-3 District. This alternative would provide units for persons with a high priority need for housing.

"Under the Alternative C variant, the sponsor would build approximately 136 regular condominiums and approximately 32 elderly/handicapped units. (Every two elderly units would be counted as one unit (Section 209.1(m) of the City Planning Code). The acquisition of adjacent lots and the double density allowed for elderly/handicapped would permit a greater density on the site without rezoning to a higher district.

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"The Planning Code requires 20% fewer parking stalls for elderly/handicapped units than are required regular units. The project sponsor would consider providing one parking space for each unit, a total of 168 spaces under this alternative. This would be 26 spaces more than would be required by the City Planning Code.

"The 168 units provided in this variant to Alternative C would result in 1176 person trip ends and approximately 504 vehicle trip ends per weekday with 50 vehicle trip ends occurring during the p.m. peak-hour.

"The demand for park and recreation facilities would be about 16% less than for the proposed project, with about 63-73 of the project residents playing tennis on a regular basis.

"Energy requirements of this variant to Alternative C would be proportionately less than those of the project (about 16%). Alternative C would develop 168 additional housing units on the site and increase the population by 252 to 294 persons. For comparison, the project population would be about 300-350 persons.

"Traffic, parking and recreation demand of this alternative could be further reduced because 32 of the proposed units would be occupied by elderly residents."

"STATUS OF ALTERNATIVE C /1/

"The project sponsor is considering developing the Alternative C Variant, but has rejected the 137-unit alternative for design and economic reasons. The sponsor believes that the hospital and convent buildings are best adapted for development of about 150 units. The development of fewer units would result in unused spaces or larger, more expensive units with inefficient floor plans."

The date "May 12, 1983" has been added to footnote /1/ on p. 86 of the EIR.

The following discussion of Alternative C will be added to p. 7 of the EIR.:

Alternative C: Use of Existing Building Only (One Parking Space per Unit)

This alternative would provide a total of 137 units. The existing hospital and convent building would be refurbished, no new construction would occur. Alternative C would require a zoning reclassification to RH-3, as well as a Conditional Use authorization for a Planned Use Development (PUD). One self parking space per unit would be provided. This alternative would not change the existing visual appearance of the site, traffic impacts would be about 30% less than those of the proposed project.

"Alternative C would increase the population of the area by 205 to 240 persons. Demand for park and recreation facilities in the project vicinity would be 30% less.

"A variant to Alternative C would construct 168 units, 32 of which would be for elderly/handicapped residents."

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"Alternative C" has been added in the 5th column to the 4th and 5th rows of Table 2: Comparison of Unit Density Allowed by RH-2 through RM-2 districts with the proposed project and alternative, p. 77 change other alternatives accordingly.

The following information has been inserted into Table 3: Comparison of Project Impacts to Impacts of Alternatives.

	ALTERNATIVE C Use of only existing buildings One parking space per unit
No. of units	137
Applicable zoning	RH-3 with PUD
New construction on Park Hill	None
Residential population	205 to 240 persons
Traffic generation	30% less than project
Parking spaces per unit	1 per unit
Total parking demand (spaces)	137-186
Off Site parking demand	0-49
Creation of new shadows on Park Hill Ave.	No
Increased demand for recreation facilities	30% fewer players
Annual energy use at source	31% less than project
Density (units per acre)	55

The alternatives currently shown as Alternatives C and D have been changed to Alternatives D and E respectively.

d. Reduced-Scale New Construction

COMMENTS

"p. 84 -- The 'sheltered courtyard' looks more like a "dark light well." How much light will units on the east side of the hospital building looking toward the new construction get?" (CRD, p. 62)

"Page 84. The neighborhood has been used to the scale of these buildings. And I have not picked up from any kind of testimony nor from phone calls or letters that there is a great concern for the scale that needs to be mitigated. I am talking about these big buildings and that they need mitigating by the new construction. I've lived up in that particular area since '52, and I have never heard a human being say they were bothered by the scale of St. Joseph's Hospital. I think the developer, . . . is trying to make a case for the new construction, but make the case some other way. The skyline has been acceptable, and there is no need to worry about it as far as most people seem to be concerned. It seems to me the developer is reaching a bit for reasons for new units, other than economic reasons." (Susan Bierman)

RESPONSE

The sheltered courtyard is intended to provide a sense of privacy to project residents by providing an interior courtyard. As indicated in the shadow diagrams on pp. 47 - 51 of the Draft EIR, at no time during the year would the new construction

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cast shadows or limit the amount of sunlight that would be available to the units located along the eastern wall of the hospital.

The second full sentence on p. 84 of the EIR states: "New townhouse construction at a reduced scale would not provide a sufficient visual transition from the existing residences to the taller hospital and convent buildings." This statement is the opinion of the project sponsor and is part of the overall design concept for the project.

e. No Project/Return to Hospital Use

COMMENTS

"Finally, another very biased statement made on Page 122 [Page 245] concerning the so-called 'no project alternative,' which would result in . . . 'No new housing units would be added to San Francisco's housing supply, and no new construction employment would result.' Well, the EIR fails to look at both sides of the story again, and the no project would also, as far as the neighborhood is concerned, maintain a peaceful quality of life in the surrounding neighborhood and also fail to make millions of dollars for Prometheus." (Greg Gaar)

". . . Page 85 . . . says that if . . . this group gets their way, there is no rezoning, and the return to hospital use alternative is the eventual use of this site, quote from Page 85 of the study, 'The 112,000-square-foot hospital building would be expected to generate about 1,900 weekday trips, or 200 percent more trips than would the proposed project.'

"Some of the people here who live near the hospital say, 'Oh, it was never a problem.' I don't agree with that. I was there in 1970, and there was a lot of traffic. And I don't know if any of you have recently driven by some of our modern hospitals, which are even more full with people than they were then — I just happened to be out at Children's Hospital today where my grandfather is, and it is insane out there. I mean, the density is heavy. There is a lot of traffic. There's a lot of people going in and out. So I think that the alternative of return to hospital use is unacceptable, and the developer here is trying to work within the means and work within the environmental surroundings and providing sufficient parking." (Graham Bryan)

". . . The Draft EIR did not note that peak hour traffic at the hospital probably did not coincide with 4:00 to 6:00 p.m., peak, as hospital workers worked three shifts, with daytime workers getting out at 3:00. (Molly Hooper)

"Hospital Trip Generation

"The draft EIR states that if the hospital were returned to hospital use it 'would be expected to generate about 1,900 weekday trips, or 200 percent more trips than would the proposed project.' (p. 85)

"This, of course, suggests that the neighborhood sustained this amount of traffic when the hospital was in full operation — a point with which we strongly disagree.

"The draft EIR's estimate for hospital-generated traffic volume is based on 1975 trip generation studies by Caltrans and ITE.

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"The draft EIR failed to state that the per bed trip generation information which they relied on provides only a very generalized picture of traffic volumes generated by hospital facilities."

"As Carl Buttke of ITE said in a recent telephone interview, 'This is not a manual, but a report, a compendium - a starting point.'

"Indeed, ITE studies show that the number of vehicle trip ends generated on an average weekday ranged from a low of three per bed to a high of 32. The Caltrans study, meanwhile, showed that the number of trips per bed ranged on an average weekday from three to 14.9, averaging out to 8.3.

"Of particular significance in determining how useful these studies are to the case of St. Joe's, one should know that virtually all of the hospitals surveyed by either Caltrans or ITE were at suburban locations, which have little or no public transportation (according to ITE staffer Buttke and Herman Chang of Caltrans)."

"Indeed, one might conclude that these studies have little bearing on past experience at St. Joe's. Judith Goldberg, former director of nurses at the hospital, said that based on past records she has saved, 60 out of 120 registered nurses at the hospital took the bus to and from work.

"A last point regarding hospital trip generation - the draft EIR did not note that peak hour vehicle traffic generated by the hospital probably would not coincide with the 4-6 p.m. peak hour for other traffic. According to Goldberg, the medical personnel worked on three separate shifts: 7 a.m. - 3:30 p.m.; 3 p.m. - 11:30 p.m.; 11 p.m. - 7:30 a.m." (CRD, pp. 10-11 and Molly Hooper)

RESPONSE

The commenter is referring to a discussion of the No-Project Alternative in the Final Initial Study on p. 245 of the Draft EIR. The Final Initial Study has been adopted as complete, and cannot be revised. The first sentence of that discussion states that the no-project alternative would retain existing conditions on the site. The description of alternatives in the Initial Study is intended to be a synopsis of each alternative. A more comprehensive discussion of the No-Project Alternative is contained on pp. 84-85 of the Draft EIR.

The discussion on p. 85 of the Draft EIR addresses reinstitution of a generic hospital use at the site. The discussion does not necessarily pertain to the past operation of St. Joseph's Hospital at the site. As the commenter notes, hospital uses present a wide range of possible traffic impacts. It is possible that renewed use as a hospital would produce traffic impacts more nearly comparable to those of the proposed residential projects. The given estimates pertaining to hospital use are midrange values of possible impacts. Without detailed plans accompanying an actual application for alternative hospital use at the site, estimates of transportation impacts are necessarily approximate.

The following sentence has been added to the end of the second paragraph on p. 85 of the EIR:

"Peak-hour traffic that would be generated by a hospital use at the site probably would not coincide with peak-hour traffic of the residential uses in the neighborhood."

13. SIGNIFICANT EFFECTS

COMMENTS

"p. 74 -- List the precise systems whose capacities would not be exceeded, what percentage of those capacities would be used, and what percentage of those capacities is used now." (CRD, p. 62)

"The Draft EIR further states on Page 74, 'No demands resulting from the project would exceed the capacities of their respective systems.' So, the criterion or parameter is some vague and undefined capacity of the systems -- we request that the Final EIR list each of these so-called systems, establish their limits, and explain how the proposal fits within them. What are the capacities of all the systems studied in the Draft EIR? (Dorothy Campbell)

"The Draft EIR states on Page 74, and I quote, 'there would be no significant environmental effects resulting from the project that cannot be avoided if the project is implemented.'

"On what basis does this report draw its conclusion? From any source included in the Draft? No. It is not a conclusion drawn from the evidence but, rather, is based on a totally unsubstantiated premise. That premise is that growth is always good and that urban residents must expect noise and overcrowding." (Dorothy Campbell)

"The conclusion stated also on Page 74 is the following, and I quote: 'With the mitigation measures included in the project or available for inclusion, increases in shading, transit use, traffic, parking, public park use, and utility and energy use resulting from the project, as well as the height and scale of the new construction, would fall within the parameters of what is expected in an urbanized area and what is planned for in this area.' Let me re-read that line. '. . . would fall within the parameters of what is expected in an urbanized area and what is planned for in this area.'

"Currently the neighborhood is zoned R-2. My husband and I built our house in 1956 because of the quiet neighborhood, fully expecting to live out our lives with the character of that neighborhood respected and protected by the City. Now we are told, not asked, that rezoning of our area and crowding of a residentially zoned area would fall within the parameters of what is expected in an urbanized area. Moreover, the likelihood looms that in the future we may be further crowded if a rezoning of the hospital, as we fear, sets a precedent for the rezoning of other lots around the park.

"We can only deduce that whoever wrote that paragraph believes that any urban area ought to be jammed far beyond the capacity that makes this a special neighborhood." (Dorothy Campbell)

". . . I have to read this because I never saw anything like it in any EIR. I don't understand it. Page 75. It is under "The Relationship Between Local Short-Term Uses of Man's Environment and the Maintenance and Enhancement of Long-Term Productivity."

Paragraph 2. "The project would increase the population of the immediate neighborhood, however it can be assumed that this population would be accommodated somewhere in the Bay Area with or without the project. Providing housing in an urbanized area and in a neighborhood where sufficient public services and utilities are available further saves resources and energy by reducing the need to extend urban systems into previously unurbanized areas."

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"To put a paragraph like that in, when a neighborhood like this is trying to preserve a very special quality that our urban design plan recognizes, that Buena Vista Park contributes to, and to talk about, you know, we should worry whether we might bother some unurbanized area, to me, is an insult. That paragraph should be stricken. If you do not strike it, then considerable work should be done on the EIR to show the value of urban park-like areas, how the quality of an urban park may change if it is overdeveloped. Probably we need that discussion anyway. But to just slip in something like that really calls for a lot of discussion about the beauty of that park and the specialness of the area." (Susan Bierman)

RESPONSE

The systems referred to in the second sentence of the second paragraph on p. 74 of the Draft EIR are police, fire, sewage, water, utility services and street maintenance. The discussion of these services on pp. 237-240 of the Draft EIR indicates that each respective service provider would be able to serve the project without the need for additional personnel and equipment or expansion or modification of existing facilities. One criterion for determining the environmental significance is whether a project would cause a public service or utility system to reach or exceed available capacity. This determination is not intended to imply that it would be desirable to reach or exceed a such capacities. The second sentence, of the second paragraph on p. 74 of the Draft EIR has been revised as follows:

"Project demand for public services and utilities would not reach or exceed available capacities (see discussion on pp. 237-240)."

The first sentence in the second paragraph on p. 74 of the EIR has been replaced with:

"With the mitigation measures included in the project or available for inclusion, increased shading, transit use, traffic, parking, public park use, and energy use resulting from the project would not cause a substantial, or potentially substantial adverse change in the environment."

The statement "... there would be no significant environmental effects that cannot be avoided if the project is implemented" is based on section 21608 of CEQA and sections 15040, 15143, and 15081 of the CEQA Guidelines. As stated in the first paragraph on p. 74 of the Draft EIR, the purpose of the "Significant Effects" chapter is to identify impacts that could not be eliminated or reduced to an insignificant level by mitigation measures included as part of the project, or other mitigation measures that could be implemented. No potential physical environmental impacts were identified in the EIR that could not be avoided if the project were to be implemented. For example, potential parking impacts identified on pp. 55-59 of the Draft EIR could be avoided by reducing the number of units in the project, and therefore was not listed as an impact "which cannot be avoided."

CEQA, sections 15143(e) and 15143.1, require that EIRs for projects with rezoning discuss general resource management concerns. By doing so, it requires a discussion which takes a broader, regional view

The second and third paragraphs on p. 75 of the Draft EIR has been deleted and replaced with the following:

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"By retaining the existing buildings on site and converting them into residential uses, the project would save open space and energy resources by reducing the need to encroach into previously unurbanized areas and to construct new residential developments. However, the scale and density of the project would alter the existing residential character of the immediate neighborhood. Project residents would increase the use of neighborhood parks, particularly Buena Vista Park. To the extent that this increased use would cause physical deterioration of Buena Vista Park, its overuse would compromise the value of the park as a community and City resource."

14. HOUSING

a. Condominium Sales and Prices

COMMENT

"The EIR's analysis of housing demand in the city is ludicrously inadequate, amounting to one clause on p. 9: "Project development is proposed . . . to respond to the demand in the City for additional housing which is evidenced by the historically low vacancy rates."

"The neighborhood specifically asked that a citywide picture of condo sales be presented in the EIR (see Hooper letter to Rosetter of 12/9/82)."

"Does San Francisco need more housing of the size and in the price range proposed? How many condos at the approximate size and price range of those proposed are there currently unsold in the city? At what size(s) and price range(s)? (See Appendix J.)" (CRD, p. 42)

"p. 83 -- How many unsold condo units are presently on the market in San Francisco of a size/price similar to this proposal?" (CRD, p. 62)

". . . on Page 9 where it vaguely mentions about the housing rate, I think it should be divided into two categories, one is rental units, which we all know there's a low rental rate, and the other is condominiums, which the other figures were mentioned. But it is a higher figure. They should mention One Baker St., which is right down the street at Baker and Haight Sts. I believe the project has been for sale or completed at least three months and maybe six months, longer, and not one unit has been sold yet. I just noticed that there is vandalism starting to take place there. The prices are around the same category."

"Another condominium project in the vicinity is 17th and Sanchez St., . . . which was a converted laundry factory, . . . and not even opened. I guess the owner went bankrupt. . . . the statement should be taken into consideration." (Richard Rothman)

"On Page 9 under Project Sponsor's Objectives, and I quote, the purpose of the project is 'to respond to . . . housing which is evidenced by the historically low vacancy rates.' And on Page 75, and I quote, '. . . there is presently a market for the type of units proposed.' Well, we have heard the arguments already contradicting these statements. The truth is, the low vacancy rates pertain to rental units and not condos, and, as stated by the Great City Realtor, there is a condo glut in San Francisco. And, as stated by two other speakers -- a perfect example, of course, is two blocks below St. Joseph's at Baker and Haight where 18 condos have been on the market for seven or eight months. And on Page 62, as stated in the EIR, 'As of March 14 . . . none of the units were occupied.'" (Greg Gaar)

"The one area which I am going to address . . . is the impact of this proposed project on property values in the area . . . In the year to date summary of sales activity published by the San Francisco Board of Realtors multiple sales service on December 30th, 1982, Volume No. 51, it is revealed that in the period from January 1st, 1982, through December 15th, 1982, a total of 1,183 condominiums of the two or less bedroom size, which is, incidentally, the size proposed in this project, were listed with an average list price of \$173,700. And that during that same period in that year, 1982, only 93 of those condominiums were sold. That is a meager 7.86 percent of the total number of all two or less, two or less bedroom size condominium size listed in San Francisco through the more than 1223 brokerage, member brokerage firms of the Board of Realtors, actually sold in 1982. This means that at the end of 1982, there was a glut of these size condominiums, the condominiums proposed by the developers of this particular project, that remain unsold.

"Also, at the corner of One Baker, which is only a few blocks from this development, 18 condominiums, which have been placed before the public for over six months of open exposure, remain unsold today, clearly indicating that this is not the kind of housing indicated in San Francisco. It's small two- and one-bedroom condominiums." (Alex Gilbert Captanian)

"I have been doing research on condominiums in the Haight, and my research shows that over half of the condominiums approved for the Haight since 1979 have not sold yet." (Janice Windborne)

"The Draft EIR states that the proposed project would provide about 200 new in-fill housing units to help meet the demand for housing generated by downtown office expansion, a priority advanced by the Mayor in her six point program of expanding housing.

"In the first place, this tortures the real meaning of the Mayor's six point plan, which seeks to encourage affordable housing. There are currently over 1500 unsold condominiums on the market in San Francisco. Secondly, the project, as the draft report notes, would not provide even one unit of low- to moderate-income housing." (Dorothy Campbell)

"The cost per square foot of the proposed units is incorrect. Appendix E is attached with the correct figures." (CRD, p. 50)

"Obviously, the proposed units are substantially more expensive than outlined in the EIR Draft." (CRD, p. 50 and Michael Immel)

RESPONSE

According to the 1980 Census 4.2% of the rental units and 8.9% of the condominiums units for sale are vacant in the City. The Census data were compiled in 1980 and may not accurately reflect the current vacancy rate of condominiums units which are sensitive to market conditions. The phrase ". . . which is evidenced by the historically low vacancy rates" has been deleted from the second sentence in the second paragraph on p. 9 of the EIR.

There are no recent, publicly available data that provide a comprehensive analysis of the supply, sales, or vacancy rates of newly constructed condominium units in San Francisco. Most available data pertains to condominium units that have been converted from other residential uses. (Department of City Planning, Glenda Skiffer, Planner, telephone conversation, May 7, 1983; Michael Estrada, Planner, telephone

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conversation, June 3, 1983; Department of Public Works; Ray Wong, Senior Civil Engineer, telephone conversation, May 31, 1983; and Jon Box, Mayor's Select Housing Advisory Committee, telephone conversation, May 24, 1983.) Major sources which provide some information concerning condominium sales, supply and vacancy rates are:

- 1) 1980 U.S. Census - STF-1A, Table 29, Tenure and Vacancy Status of Condominiums.
- 2) Department of City Planning, December 1981, Preliminary Progress Report, Condominium Research.
- 3) Mayor's Select Housing Advisory Committee (MSHAC), March 23, 1983, Tentative Total for Condominium Subdivisions, 1980 and 1981. This Committee is conducting a City-wide survey of condominium residents. Data from that survey will not be available until July 1983; the Committee's Final Report should be available by the late 1983 (Jon Box, MSHAC, telephone conversation, May 24, 1983).
- 4) San Francisco Board of Realtors, Multiple Listing Service. It should be noted that the Multiple Listing Service of the Board of Realtors is not necessarily a comprehensive record of condominium sales, since many realtors in the Bay Area do not register the condominiums which they have for sale with the Board. Those who do register condominiums for sale sometimes do not remove those units from the list when they are sold. (Bill Jansen, Vice President and General Manager, Pacific Union, and member of the Board of Directors, San Francisco Board of Realtors, telephone conversation May 31, 1983; Joe Donahue, Director of Sales, TRI, telephone conversation May 1983; and Dan Brady, Real Estate Agent, and Attorney at Law, McGuire Realty, telephone conversation June 3, 1983.)

Based on the sources above, as of late 1981, there were a total of about 6,200 condominium units in the City. Of these 6,200 units, about 9% were vacant units that were for sale and 8% were vacant but not for sale, a total vacancy rate of about 17%. None of the above sources contain information on the size or bedroom mix of the units that were sold. The Condominium Research Report prepared by the Department of City Planning (DCP) indicates that, as of March 31, 1981, 67% of condominium units costing \$75,000 or under sold; 53% of the units in the \$75,001 - \$125,000 range sold; and 35% of the units in the \$125,001 - \$175,000. Less than 30% of the units with selling prices over \$175,000 sold; all reported sales prices are in 1981 dollars. The expected selling price of the units in the Park Hill residential project would range between \$111,200 - 316,000, with an average price of \$150,000 (1983 dollars). Even accounting for inflation, the 1981 price ranges of unsold units reported by DCP cannot be strictly applied to the Park Hill Residential project due to the recent fluctuations in the San Francisco property market which are very price sensitive.

Because no units were sold, the One Baker St. condominiums are no longer on the market for sale. This development has been sold to a group of investors and will become rental units in July 1983. The units at One Baker St. are two-bedroom with two bathrooms and have an average floor area of 1225 sq. ft. The original asking price was \$185,000 to \$230,000. (Don Gerring, Rental Agent, One Baker St., telephone conversation, May 29, 1983). The second sentence of the first full paragraph on p. 61 has been replaced with:

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"These units were acquired by a group of investors in May 1983, and are expected to be placed on the market as rental units in July 1983."

Footnote /11/, p. 63 of the EIR has been replaced with:

/13/ Don Gerring, Rental Agent, One Baker St., telephone conversations, May 19, 1983 and June 3, 1983.

The Casa Sanchez condominiums are located at the corner of 17th and Sanchez. The Casa Sanchez was taken off of the market in 1982 because none of the units were sold. The condominiums are currently being altered and will be placed on the market again in mid-July, 1983. The project will be 55 units, consisting mostly of one-bedroom and studios. (Art Livine, Casa Sanchez, telephone conversation June 1, 1983.)

Knowledgeable realtors who specialize in condominiums sales in San Francisco indicate that there is a current oversupply in San Francisco of all types and sizes of condominiums. This could be a short-term fluctuation in the market. Housing demand tends to reflect the economic climate; thus as the economy picks up so should the sale of condominiums and other residential property. (Barbara Craig, Founders Title Company, telephone conversation June 1, 1983, Linda Service, Evans Pacific, telephone conversation, May 1, 1983; and Richard Pikit, Real Estate Agent, Pacific Union, telephone conversation June 1, 1983.) Initial project occupancy of the Park Hill project is anticipated for early 1985. Demand for the project units would depend on whether the market can absorb unsold condominium units currently for sale, new units currently approved or under construction, rental units that would be converted into condominiums, and condominiums that are currently rented that would be placed back on the market.

The general opinion of real estate brokers is that, although there is a current slowdown in the sales of residential property, there is still a need for all types of housing in San Francisco. The Park Hill project would help meet this need. (Preston Cook, Chairman of the Mayor's Select Housing Advisory Committee and President of TRI, telephone conversation, May 31, 1983; Barbara Craig, Founders Title Company, telephone conversation June 1, 1983; Bill Jansen, Vice President and General Manager, Pacific Union, and member of Board of Directors, San Francisco Board of Realtors; Ann Sherbert, Residential Manager, Coldwell Bankers, telephone conversation May 31, 1983).

On the basis of a fully amortized loan with fixed payments over 30 years, and including current tax rate, association fees, insurance etc., the purchaser of the average condominium in the Park Hill project, would have to earn a household income of about \$47,000 per year (CRD, Appendix J and Alex Gilbert Captanian). As the commenter states, this purchase price would not provide housing opportunities for low- and moderate-income households.

As stated in the last paragraph on p. 23 of the Draft EIR, the project sponsor estimates that the unit cost for the proposed units would be \$200 per sq. ft. The average unit size would be 750 sq. ft., resulting in an average unit price of \$150,000. Individual unit prices would reflect specific unit size, locations and amenities. The largest units in the project as proposed are the three units in the main floor and balcony of the chapel sanctuary. In response to the concerns of The Foundation for San Francisco's Architectural Heritage (see comment on p. 175), the project sponsor is considering eliminating these units. This would lower the upper range of prices in the project.

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The last two sentences of the third full paragraph on p. 23a of the EIR have been changed to read:

"The condominium units are expected to sell for about \$200 per sq. ft, ranging in selling price from \$111,200 to \$316,000. The average unit selling price would be about \$150,000."

b. Population Per Household

COMMENT

"The Environmental Impact Report states, in determining its population per household calculations for the Park Hill project, and in determining automobile ownership of the project, that, and I quote, 'There is no precise method of predicting population per household or unit for a new residential development. Population per unit is based on a variety of factors, among which are the number of bedrooms per unit, the size and purchase price of a unit, and current market conditions such as vacancy and interest rates. Sources for estimating population per household are marketing, real estate brokerage firms, population per unit at other residential complexes, and the United States Census.'

"The Environmental Impact Report then goes on to cite one telephone . . . with one leasing agent, who happens to be employed with the firm of TRI here in San Francisco, who is the leasing agent already committed to work with the developer . . . who stated her personal opinion that the occupancy of these units would probably be 1.5 persons per unit." (Alex Gilbert Captanian)

"The overwhelming majority of the units are one bedroom and studio units, which is completely out of character with the varied mix of housing in the neighborhood. The proposal contains no three or more bedroom units - effectively eliminating families with children in a neighborhood where families with children are an important part of the diversity and attraction of the area. The EIR fails to examine the demographic mix of the neighborhood at all." (CRD, p. 53)

"p. 4 -- Compare 300-350 new people to the number of residents in contiguous blocks." (CRD, p. 58)

RESPONSE

The population-per-household estimate was not used in the EIR analysis to determine automobile ownership; the estimates were used to determine total project population and impacts on park and recreation demand and existing density in the Buena Vista neighborhood. See response on pp. 130-131 of this document concerning vehicle ownership.

As stated on p. 249, Appendix B of the Draft EIR, the population per household estimate of the Park Hill Residential project is based on several sources, including a real estate broker, other residential complexes, and the 1980 U.S. Census. The real estate brokerage firm of TRI was contacted because this firm is the potential sales agent for the project and, as such, would be a knowledgeable source. TRI provided a professional estimate (not personal opinion) of 1.5 persons per household, which was used to calculate the minimum number of expected residents in the Park Hill project. The U.S. Census information provided the expected maximum number of residents at the Park Hill site. Throughout the EIR the range of anticipated residents was indicated; at no time was the lower estimate provided by TRI referred to

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exclusively. To further address the commenter's concern, two additional real estate firms were contacted to provide estimates of population per household for a development with a similar location, size and bedroom mix on the Park Hill project. Both firms estimated a population per households of 1.5 or lower. (Richard Pilat, Real Estate Agent, Pacific Union, telephone conversation June 1, 1983, and Dan Brady, Real Estate Agent and Attorney at Law, McGuire Real Estate, telephone conversation June 3, 1983).

Analysis of environmental effects is limited by the California Environmental Quality Act (CEQA) to physical conditions; see Sections 21060.5 and 21151, as amended by Senate Bill 803. The following discussion of population characteristics are not a necessary part of environmental analysis and is provided for the information of the commenter.

The Buena Vista neighborhood consists of predominantly two- and three-family buildings, there are also many single-family homes and a number of low-rise and mid-rise apartment houses in the area. (John M. Sanger Associates, November 24, 1980, Feasibility Study: St. Josephs Hospital.) The project site is located in Census Tract #170. Tract 170 is bound by Duboce Ave. to the north; 17th St. to the south; Castro St. to the east; and Upper Terrace to the west. The 1980 Census reports the median number of persons per unit in Tract 170 is 1.60 with a mean population of 1.75. Approximately 3,300 persons reside in Tract 170. Of these residents 2,125 are male and 1195 are female. About 0.6% of the total residents are of age 18 or younger. Approximately 12% of the residents are minority population; 88% are white.

As shown in Appendix B, p. 248 of the Draft EIR, approximately 83.0% of the proposed units would be one-bedroom units, thereby discouraging residents with children. However, 25 of the units would have two bedrooms, which would allow up to 25 children to reside at the project. This would result in a population mix of 8-7% children which is similar to the surrounding neighborhood.

Blocks 2608, 2614 and Buena Vista Park (Block 2601) are contiguous to the project site, see Figure 12 on p. 25 of the Draft EIR. On the basis of an average population of 1.75 person per unit, Block 2608 has about 120 residents, and Block 2614 has about 80 residents. The project block, Block 2607, has about 90 residents, mostly residing in apartment buildings. These estimates account for each unit on a single lot (i.e. duplexes, triplexes and apartment buildings).

Exclusive of the 90 residents currently on the project block, the Park Hill residents would represent about 150% to 175% of the existing population on surrounding blocks. The project would increase the population on the project Block by 300 - 350 persons, which is about a 435% to 490% increase over the existing 90 residents living on the project block.

Unit per lot information used in the comparison above is based on the Street Address and Ownership files and Parcel/Lot Books available at the San Francisco Assessors Office."

c. Effects on Property Market

COMMENT

"Neighborhood home owners are extremely concerned that the value of their properties will diminish if this oversized project is permitted to go forward. People are attracted to buy property in the Buena Vista area because it is quiet and beautiful, as described in the Urban Design Element of the Master Plan. It will no longer be quiet if this proposal goes through. Buena Vista Avenue East will become a thoroughfare, the streets will be crammed with cars and the hospital complex will be made even more oversized. The effects on local property values must be evaluated. (See Appendix J.)" (CRD)

". . . I would like to talk about the impact on property values in the area. Recent conversations with the respected appraisal firm of Farnow & Farnow, Inc., here in San Francisco, and their representative, Daniel D. Wilson, have indicated that the average household size in square footage in the Buena Vista neighborhood is between 1600 and 2500 square feet, yet the Environmental Impact Report suggests that the development, with average unit sizes of 700 square feet, is similar to the surrounding uses in the area. The only similarity is the fact that they are residential, proposed residential uses.

"If this project is approved in the size and density as proposed, the impact will be what is known by appraisers as that of economic obsolescence. Economic obsolescence is caused by factors external to the property being appraised. Such depreciation usually affects many properties in the area and is beyond the control of an individual property owner. Examples of economic obsolescence are the proximity of an improvement to a freeway or railroad, infiltration of inharmonious land uses, changes in legislation or zoning, and changes in the character of population in the neighborhood.

"The proposed development with condominiums averaging in size of 700 square feet will not only be adverse and inharmonious with the existing units in the area, but will result quite clearly, and this has been confirmed by the firm of Farnow & Farnow Real Estate Appraisers, would result in what is known as subsidiary principle -- in the subsidiary principle of regression. That is to say, and I quote from the Prentice-Hall series in California real estate, published 1979, on real estate appraisal techniques, which is an authority and handbook used by almost all appraisers in San Francisco -- and I quote, 'that the subsidiary principle of regression is that occasionally a large custom-designed, quality-constructed home is found in a neighborhood of homes less than half its size and of inferior construction. A large home of 3,500 square feet in a neighborhood of similar, large, good quality homes could be worth, say \$100,000 or more. However, in a neighborhood of homes of 1600 square feet and moderate construction, it might be worth less than \$70,000. The unit of higher value loses value when located in an area of lower value units. This is called regression,' unquote.

"I submit to you that the proposal submitted by these developers and its impact on the environment is a calculated maneuver to capitalize on the high property values that currently exist in the Buena Vista neighborhood, and that by cramming this neighborhood with units of 700 square feet average in size, they will attempt to extract the highest price per square foot as is possible by capitalizing on the demand and increased desirability of being able to buy such a unit in a neighborhood that has a reputation of quality housing of the size and property value that exists presently.

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"In short, it will result in an inestimable loss of value of equity interest by every resident in and around and within the vicinity of this project." (Alex Gilbert Captanian)

RESPONSE

According to some real estate theories, the introduction of a dissimilar residential use in an established neighborhood could affect real estate values. The dynamics of this effect include numerous variables which make it difficult to predict the exact effects. The following paragraph has been inserted into the new housing discussion in the Growth Induction section on p. 69b of the EIR:

"The majority of homes in the Buena Vista neighborhood have an average size of between 1,600 and 2,500 sq. ft.; the project would have an average unit size of 750 sq. ft. According to some real estate theories, unit size is one factor that can influence land values when there are dissimilar residential uses in a neighborhood. This effect on land uses in the Buena Vista neighborhood cannot be determined."

"See Sections 4. TRAFFIC, e. Construction Effects, p. 126 for a discussion of traffic and potential noise effects of the project. Noise effects are also discussed on pp. 233-235 of the Draft EIR.

15. CUMULATIVE DEVELOPMENT

NOTE: Comments in the Community Responses Document incorporated by reference an article entitled "The Haight Under Seige" by Sharon Elise Dunn, Bay Guardian, March 16-23, 1983 (CRD, p. 41). That article, which documents development pressures in the Haight Ashbury area, is not a specific comment concerning revisions to the EIR, and therefore cannot be incorporated by reference as a comment.

The article cited is useful, however, as background information of projects proposed for development in the Haight. All of the cumulative projects listed in the article are also listed in the comments under a. PHYSICAL EFFECTS OF CUMULATIVE DEVELOPMENT IN THE GREATER HAIGHT ASHBURY AREA, below. All of the concerns raised in that article are also raised in both the comment below and the one immediately following, b. CONSISTENCY OF CUMULATIVE DEVELOPMENT WITH 1973 DCP STUDY.

a. Physical Effects of Cumulative Development in the Greater Haight Ashbury Area

COMMENT

"This proposal must not be considered in a vacuum. The greater Haight-Ashbury is coming under acute pressure from many other proposals as well. The EIR must evaluate how this proposal would fit into the context of other major potential changes in this part of San Francisco.

"This letter is written to express our concern as community representatives for the future of our neighborhood, the "Greater Haight Ashbury", which has recently become the focus for a great deal of development interest and activity. The size, nature and economic/social/environmental costs and benefits of the many projects on the agenda or

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newly introduced into this area have a great deal of significance for those who live and work here. Of necessity, the plans for each development project must therefore be reviewed separately on its individual merits and potential compatibility with our relatively high density urban community, and cumulatively in terms of their impact taken together on the quality of life in this area.

"The projects (see attached, partial descriptive list) we are presently referring to will by their nature bring more traffic, people, competition for parking, noise and other environmental factors (i.e.: garbage, chimney discharge, sewage, etc.) into our area. As community representatives and city dwellers, we believe that growth is integral to urban life and development can be positive. However, we must endeavor to ensure that all such growth and development be so designed and carried out as to enhance the quality of life and services available in our area, in a manner appropriate to the existing neighborhood population, needs, income levels and articulated preferences." (Haight Ashbury Improvement Association / Haight Ashbury Neighborhood Council, and Molly Hooper)

"I want to note that the Draft EIR never considered the impact this project might have on the Haight St. commercial zone, an area which is already overly congested with cars." (Molly Hooper)"

A Partial List of Development Projects:

"University of California, San Francisco

- "-- A 140,000 to 160,000 gross sq. ft. library, to be constructed in addition to an already existing library facility. As presently designed, this building would be erected on the already heavily built up "shelf" between Parnassus and Irving Sts.
- "-- Three separate 'research modules' each averaging 30,000 gross sq. ft.
- "-- Extension of an existing parking lot.
- "-- Removal of four or five houses from the campus to Kirkham St. and demolition of two others.
- "-- Contracting for a parking and traffic study, which will examine among several options, the construction of a parking garage.

"Polytechnic High School

- "-- UCSF is discussing with the Unified School District the possibility of leasing Poly to demolish the existing structures and construct approximately 175 units of housing. At this point the feasibility and costs are unclear - the cited figures now are rents averaging over \$1,000 a month making the project prohibitively costly for students.

"St. Mary's Hospital

- "-- Construction of a 100,000 gross sq. ft. office building standing 6-1/2 stories high at the site of a now-vacant lot on the corner of Shrader and Fulton Sts. The building would accommodate 100 physicians, 285 parking places, 1,200 daily patient visits and 1,605 vehicular trips.

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-- A central building comprised of 112,000 gross sq. ft. with space for 160 cars.

-- St. Mary's is investigating options for off-site parking. Areas which have been mentioned include a now-vacant lot at the corner of Shrader and Fell Sts. and Elkins Garage on Hayes St., neither of which the hospital presently owns.

"Mercy Services Corporation, Parent Company of St. Mary's

-- Conversion of Harkness Hospital into Mercy Terrace. 158 units of senior housing located in the large and long-empty hospital building on Fell St. between Baker and Lyon Sts. The site includes two large ancillary buildings with no plans yet.

"Stanyan Park Hotel

-- The first explicitly tourist/hospital visitor-oriented hotel in the Haight (as indicated by their publicity), the hotel has about 40 rooms.

"University of San Francisco

-- Proposed energy projects include an \$11 million dollar "co-generational power plant" which will be based on natural gas with a diesel fuel back-up capability. The plant, designed to serve USF's energy needs and sell power to St. Mary's Hospital and PG&E, will be twelve times larger than any comparable facility in a residential area. The proposed site is currently a small surface parking lot on the corner of Cole and Fulton Sts.

-- The University is also proposing construction of five 60-ft. tall windmills with blades an additional 32 feet in diameter for the top of Lone Mountain. This too will be a project unprecedented in a residential area.

-- The University has various other components planned in the Master Plan and has recently expanded the potential use of their soccer field by adding large banks of bright night lighting.

Haight Street Commercial District

-- At this time City Planning has not completed their particular design for the Article 9 rezoning of the Haight Street Special Use District. In the last year, some 40 stores have joined the commercial uses on the street. Proposals have also come in for development of the existing surface parking lot at the corner of Haight and Shrader streets and plans are anticipated for the currently empty corner of Cole and Haight Sts.

"Estimates of potential impacts of these projects include the possibility of over 1,000 new residents, thousands of new cars and exacerbated development pressures in a residential and commercial area where displacement has been an issue in the past largely for residents and is now a major concern among business owners. Until a comprehensive Environmental Impact Report is done, the community cannot really begin to assess in any detail the actual impacts on traffic, parking, noise and density." (CRD, pp. 38-41 and Haight Ashbury Improvement Association/Haight Ashbury Neighborhood Council.)

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"We in the Haight are faced with a series of proposed projects which, if they are approved, only can change for the worse the quality of life in our neighborhood. These projects will, by their very nature, bring more people, more traffic, more noise, more competition for parking, and pollution to our area. I am coming to you with the same spirit that the presidents of five of our neighborhood groups intended when they sent a letter to Mr. Rosenblatt asking for a moratorium on all of these projects. We believe that all of these proposals should be viewed together for the cumulative impact on our neighborhood. What this Environmental Impact Report refused to do was deal with all of those proposals."

"We are faced with plans by every institution around us to expand into our open space, our residential areas and our skies. UCSF has proposed a 160,000 sq. ft. library and three research modules, which are supposed to be 90,000 sq. ft. I don't know what kind of research will be done. We don't know whether there will be hazardous waste, and we don't know where these new researchers will park. They want to make 175 rental units where Poly Technic High School now stands, and the proposed rents for these are going to be over \$1,000. These are supposed to be for students. St. Mary's and Mercy Hospital propose to build a 100,000 sq. ft. office building, six and a half stories high, plus a three-story building. Not only would these generate more people and more chaos, but 1,605 vehicle trips daily. And where are these going to park? They have bought Harkness Hospital and they have 159 new housing units, and there's two remaining buildings left. USF is supposed to build a cogeneration power plant with unknown pollution and five windmills -- not your Dutch romantic kind, but six-story high windmills on top of a mountain.

". . . Without a Master Plan for the Haight, we who have the misfortune of living in the lowlands of the Haight can look forward to a horizon darkened by tall buildings on all sides, increased air and noise pollution, and even more scarcity of parking. The bustle of Haight Street could easily become so congested with monocarbons and horns blowing that it will be oppressive to shop there and annoying to live nearby. We live in the Haight because we like the quality of life as it is now and because we can afford it. You have the power to dictate the future of our city and our neighborhoods, and only one of you lives in the Haight." (Janice Windborne)

RESPONSE

The CEQA Guidelines for implementing the California Environmental Quality Act (CEQA) require that cumulative impacts be considered in an EIR wherever "two or more individual effects which, when considered together, are considerable or . . . compound or increase other environmental impacts" (Section 15023.5). Because some environmental effects of other proposed projects in the vicinity of the Park Hill Residential project could "compound or increase" the effects of the Park Hill project, these effects are considered in a new Chapter of the EIR, IV. F. CUMULATIVE EFFECTS.

The analysis of cumulative effects is limited to a discussion of only those physical effects which would accumulate with those of the project. Thus, the "quality" of life in the Haight Ashbury resulting from the construction of all known proposed projects in the area is not addressed. This is consistent with the CEQA Guidelines' definition of the affected "environment" as the physical environment only (Section 15026). In addition, those effects which would not accumulate with those of the project, such as potential parking effects around the USF-Lone Mountain campus due to proposed projects there, are not addressed.

X. Summary of Comments and Responses

The list of proposed projects analyzed in the cumulative analysis was determined by verifying the list contained in the Comment above with the Department of City Planning, and by checking with the Department for information on any additional projects in the Haight Ashbury area. Only those projects of which the Department had been officially informed (by receiving a site permit application, an Environmental Evaluation Application or a similar notification), or were known to have definite plans were included in the analysis.

Of the projects listed in the Comment above, only the UCSF projects (excluding the parking and the traffic study), the Mercy Terrace project, the St. Joseph's Hospital project (which has been analyzed in this EIR as the Park Hill Residential project), and the USF projects were considered definite enough for analysis in this EIR.

Plans for other projects listed in the Comment are not definitive and are not yet under review, although some proposals have been discussed with the Department of City Planning. Therefore it cannot be assumed with any certainty that these projects would be operating at the time of completion of the Park Hill Residential project. Because the estimated effects of these projects would be speculative, the CEQA Guidelines do not require their inclusion in the analysis (Section 15140 (h)).

The Department of City Planning identified one other project in the Haight Ashbury area for which they had received a permit application: a bowling alley at 1855 Haight Street which had applied to extend its operating hours until 2:00 a.m. (Angelica Chiong, Planner, San Francisco Department of City Planning, telephone conversation, June 2, 1983.) Since this is an existing use, and the effects of its extended operating hours are unlikely to accumulate with effects of the Park Hill Residential project, the bowling alley was not included in the cumulative analysis.

The following is added after p. 69b-69g of the EIR as Chapter IV.F. CUMULATIVE EFFECTS;

"F. CUMULATIVE EFFECTS

"Table 2a lists five proposed projects in the Haight Ashbury area which are likely to be in operation at or shortly after completion of the Park Hill Residential project, and have environmental effects which could compound with those of the Park Hill Residential Project. These potential environmental effects are addressed by category below.

"TRANSPORTATION EFFECTS

"The proposed UCSF additions and Mercy Terrace housing development could generate peak-hour vehicle and transit trips, as shown in Table 2b, p. 199 The USF co-generation power plant and wind turbine generators would likely generate fewer than 10 peak-hour person trips, which would have a negligible effect on peak-hour traffic conditions. Estimated peak-hour vehicle and transit trips generated by the Park Hill Residential project are shown for comparison.

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TABLE 2a: PROPOSED PROJECTS IN THE GREATER HAIGHT ASHBURY WHICH COULD HAVE CUMULATIVE EFFECTS WITH THE PARK HILL PROJECT

<u>Project Sponsor</u>	<u>Proposed Use</u>	<u>Floor Area (gross square feet) or Units</u>
University of California, San Francisco	1) Library	140,000 - 160,000
	2) Research Buildings	90,000
Mercy Services Corporation (Mercy Terrace, Fell St. between Baker and Lyon Sts.)	3) Housing for the Elderly	158 units
University of San Francisco	4) Co-generation Power Plant	unknown
	5) 5 Wind Turbine Generators	—

SOURCE: San Francisco Department of City Planning

"The estimates shown in Table 2b are worst-case as they assume that all trips would be new trips arriving or departing from the proposed use. It is likely, for example, that many of the trips to the UCSF Library Addition would not be new trips. They would, instead, be multi-purpose internal trips within the University, which are part of already existing vehicle trips to attend classes. Because the elderly generally make fewer peak-hour trips than do other age groups, the number of trips shown for the Mercy Terrace housing is also likely to be an overestimate.

Major routes through the Haight Ashbury area which would carry major portions of peak-hour vehicle trips generated by all of the projects in Table 2b are Fell St., Oak St. and Haight St. Of the total 465 new peak-hour vehicle trips shown in Table 2b, about 200 would occur on Oak, Fell and Haight Sts., combined. The remaining trips would be distributed on minor streets oriented to the north, west and south of the area. Since Oak, Fell and Haight Sts. currently carry about 2,500, 2,800, and 540 vehicle trips, respectively, during the peak hour/1/, new vehicle trips from the Park Hill project and cumulative development would represent about a 0.3% addition to peak-hour volumes on any of these streets. If about 150 vehicle trips per hour were added to each lane of one approach at a typical signalized intersection on Oak, Fell, or Haight Sts., an additional 10% of capacity would be used. Because about 200 new peak-hour trips would

TABLE 2b: ESTIMATED PEAK-HOUR TRIP-ENDS* GENERATED BY CUMULATIVE PROJECTS

<u>Proposed Project</u>	<u>Vehicle Trip-Ends**</u>	<u>Person Trip-Ends on Muni**</u>
UCSF Library Addition	300	300
UCSF Research Buildings	65	65
Mercy Terrace	45	45
Park Hill Residential (net new trips)	55	25
	<hr/>	<hr/>
TOTALS	465	435

* A trip-end is one destination of a round trip.

** Based on trip generation factors contained in Caltran's Trip End Generation Research Counts, Vol. 10, and ITE, Trip Generation, 1975. Transit use was assumed to represent 40% of peak-hour travel, and autos were assumed to account for 55% with an average occupancy of 1.4%.

SOURCE: Environmental Science Associates, Inc.

be distributed among the three lanes of Oak Street, three lanes of Fell Street and two lanes of Haight Street, the resulting increase in capacity in use at intersections on these streets would be less than 10%.

"Muni lines available to the project and cumulative development are shown in Table 2c, p. 200. Lines which would serve all the projects listed, and which thus would experience the greatest cumulative impact, are the 6 Parnassus and the 66L Quintara Limited. Because the peak-hour Muni trips shown in Table 2b would be distributed among four lines for the UCSF projects, among eight lines for Mercy Terrace and among five lines for the Park Hill Residential project, and because each line runs four to ten buses (LRV's for the N Judah) per hour, cumulative development could add roughly 10 to 25 riders to each bus on the 6 and 66L lines during the peak hour. Both Mercy Terrace and the Park Hill Residential project are served by two lines in addition to the 6 Parnassus and the 66L Quintara Limited: the 7 Haight and the 71 Noriega. The 7 Haight and the 71 Noriega could experience about one to five additional passengers on each bus during the peak hour due to these two projects. Project impacts on the 37 Corbett line, discussed on pp. 59-60 of the Draft EIR, would be unlikely to be increased by proposed cumulative development.

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"PARKING

"As UCSF is over 6,000 feet from the Park Hill Residential project, it is unlikely that there would be any cumulative parking effects attributable to these two projects. Generally, people park within walking distance (roughly 1,000 - 1,500 feet) of their destinations.

TABLE 2c: MUNI LINES SERVING CUMULATIVE PROJECTS

<u>Proposed Project</u>	<u>Muni Lines Within 3 Blocks</u>
UCSF Library Addition and Research Building	N, <u>6</u> , 43, <u>66L</u> *
Mercy Terrace	5, <u>6</u> , <u>7</u> , 16X, 21, <u>66L</u> , <u>71</u> , 72X
Park Hill Residential	<u>6</u> , <u>7</u> , 37, <u>66L</u> , <u>71</u>

* Bus lines underlined in the table are those which would have a cumulative effect with the Park Hill project.

SOURCE: San Francisco Municipal Railway and Environmental Science Associates, Inc.

It is not likely, therefore, that the Park Hill Residential project would contribute to parking demand near UCSF, nor that UCSF would exacerbate the project's effects in the Park Hill neighborhood. Mercy Terrace is about 1,600 feet away from the Park Hill Residential project. At this distance, it is unlikely that parking at the two projects would overlap, particularly because the residents at Mercy Terrace would be elderly, and the perceived distance between the two projects would be made greater by the Panhandle and the topography of Buena Vista Hill. Shoppers from these two residential projects could together contribute incrementally to increased parking demand near the Haight St. commercial district.

"AIR QUALITY

"Haight, Oak and Fell Sts. experience good air quality, as does almost all of San Francisco west of the downtown, because of the prevailing winds from the ocean. Existing carbon monoxide concentrations along Oak and Fell Streets are about 11 parts per million (ppm) for the peak one-hour period (morning "peak hour" for Oak St.; evening "peak hour" for Fell St.) and 6 ppm for the peak eight-hour period during stagnant air mass conditions./2/ Haight St. experiences slightly lower worst-case concentrations: about 8 ppm during the evening peak hour and 5 ppm over the peak eight-hour period./2/

X. Summary of Comments and Responses

Traffic from the projects shown in Table 2b would increase existing one-hour and eight-hour carbon monoxide concentrations along all three arteries by less than 0.5 ppm, an amount well within estimated daily fluctuations in concentrations of 3-4 ppm. Worst-case (poor dispersion) concentrations along Oak and Fell Sts. would remain at about 50% - 55% of the state one-hour standard of 20 ppm, and about 65% of the state eight-hour standard of 9 ppm./2/

"NOISE

"Existing 24-hour noise levels (Ldn) are about 70 decibels (dBA) along Haight Street, and about 75 dBA along Oak and Fell Sts./3/ These noise levels are loud enough to cause one to raise one's voice to be heard three feet away, and are considered very annoying (particularly bus accelerations along Haight St.). Traffic from the four proposed projects and the Park Hill project would not increase existing noise levels as noise from these projects would be masked by the existing noise levels.

"GROWTH INDUCEMENT

"The projects listed in Table 2a, together with the Park Hill Residential project, could affect land values and residential and commercial rents in the greater Haight Ashbury./4/ The extent of these effects cannot reliably be quantified. See also Section IV.E. Growth Inducement, pp. 68-69b.

"All of the projects listed in Table 2a would have local environmental effects, such as shading, parking, visual and land use effects, which would not accumulate with those of the Park Hill Residential project, and which would more appropriately be addressed in project-specific EIRs for those projects.

"NOTES - Cumulative Effects

"/1/ Based on a series of 24-hour counts taken in 1977 and 1980 by the City and County of San Francisco, Department of Public Works, Traffic Engineering Division. The peak hour on Oak St. is in the morning; on Fell and Haight Streets, in the evening.

"/2/ Calculations based on Bay Area Air Quality Management District, 1975, Guidelines for Air Quality Impact Analysis of Projects and California Air Resources Board, 1981, "EMFAC-6C Emission Factors."

"/3/ City and County of San Francisco, Department of City Planning, September, 1974, Environmental Protection Element of the Comprehensive Plan.

"/4/ Construction of a power plant and wind turbine generators at USF's campus could decrease property values in the immediate vicinity of the campus, as this could be conceived as an incompatible use, depending on the design and potential operating nuisances."

See also response on p. 206 of this document concerning Master EIR for the Greater Haight Ashbury.

b. Consistency of Cumulative Development with 1973 DCP Study

COMMENTS

"The nature of these projects [cumulative] must also be examined in light of the earlier City Planning Department Study for the Haight Ashbury. Questions concern: a) the appropriateness of adding additional medical facilities in the context of San Francisco's currently over-developed health care system, b) the divergent character of proposed uses such as a power plant from the residential character and physical environment of the surrounding community, c) the change in zoning in increased density asked for by the Prometheus project developers and the impact of such a plan on less-trafficked streets in the Haight area. d) the continuing seriousness of the traffic and parking problems in the area surrounding the University of San Francisco.

"These are only a few of the concerns which have been continually raised by community groups and residents in local meetings and before the Planning Commission." (CRD, p. 91 and Haight Ashbury Improvement Association/Haight Ashbury Neighborhood Council)

"The nature of these projects must also be examined in light of the earlier City Planning Department Study for the Haight Ashbury. Given the level of proposed development in our community and the fact that much of this development is being planned or undertaken by the large institutions located in this area - specifically, the University of San Francisco, St. Mary's Hospital and the University of California, San Francisco, we would like to direct your attention to a fairly comprehensive study done by the Department of City Planning for the Haight Ashbury between the years of 1971-1973. This plan to some extent dealt specifically with matters such as institutional expansion. This study clearly involved an investment of public time and monies, spent in examining data, meeting with community people and presenting guidelines for local development. Among the goals therein articulated were 'encouraging social diversity' and 'maintaining and improving the quality of the environment', each of which continue to be priorities for community groups and are our major impetus in calling for a comprehensive review process and temporary moratorium on large development projects at this time for our area.

"In addition to the City Planning study, community organizations and individuals here have participated in the preparation of two other planning studies: the Mt. Sutro Master Plan, which focused primarily on the preservation of Mt. Sutro as open space and the appropriate course of development in the area immediately surrounding UCSF and Mt. Sutro; and the Haight Street Plan, which presented information and guidelines for the growth of Haight Street. Each of these community-based plans has been officially recognized by the Department of City Planning and the Planning Commission.

"As our neighborhood organizations are all volunteer, it has proven very difficult for us to keep up to date on all the detailed information which is essential for understanding and evaluating each individual development. Further, it has been almost impossible for an over-extended community group such as ours are to also garner sufficient information to put each project into the appropriate and critically important context - the entire development scenario for the Greater Haight Ashbury. As every new project built or store opened necessarily becomes an ingredient in the overall community, so therefore must every project also be assessed in terms of its part in the whole.

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"The neighborhood organizations, residents, business and home owners, and working people of this area wish to preserve its unique character and to continue to contribute to and benefit from its major appealing resource - diversity. This community now has a strong, highly socialized residential component, many active community groups and a varied economic base which is comprised of mixed, largely neighborhood-serving commercial uses. These components of our neighborhood should be protected from encroachment by developments which are out of scale and character with existing zoning, uses and structures.

"Relevant Excerpts from the Department of City Planning's "Improvements for the Haight Ashbury" dated July, 1973.

"General Goals:

- 1) Encourage social diversity.
- 2) Maintain and improve the quality of the environment.
- 3) Promote the economic well-being of people in the Haight Ashbury.

"Areas of concern, policy statements and recommendations (excerpted):

"1) New Development

Policy: Preserve the existing scale and character of the Haight Ashbury.

Recommendations: Encourage compatible new housing construction where it meets neighborhood needs . . . encourage the kind of housing the neighborhood needs" low and moderate income family housing.

"2) Hospitals and Universities

"Policy: Establish guidelines for future growth.

Recommendations: Future development should be strongly influenced by environmental considerations. The heavy concentration of large institutions in the area has resulted in some development which is incompatible. . . (it) has generated serious parking and traffic problems.

"Medical facility expansion should be compatible with the comprehensive health service needs of San Francisco.

"There should be no expansion of facilities beyond present land holdings or beyond that called for in an approved Master Plan.

"3) Residential Protection

"Policy: Protect residential areas from excessive automobile traffic.

Recommendations: Increase safety and provide protective buffering along heavily traveled portions of 17th, Stanyan, Parnassus, Frederick, Clayton, Ashbury, Masonic, Oak, Fell, Hayes, Fulton and along the portion of Carl Street which serves as a route for the N-Judah. . . . This should be accomplished through the use of such measures as stop signs, traffic signals timed for desirable speeds, well-lighted and clearly defined pedestrian crossings, trees, street furniture, low walls and additional landscaping.

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"Preserve and enhance the residential environment along lightly traveled streets. . . . Action should include narrowed intersections, other curb realignments to discourage through traffic or facilitate parking, street trees and additional landscaping.

"4) Institutions

"Policy: Reduce congestion around hospitals and universities.

"Recommendations: Establish off-street parking requirements for the hospitals and universities based on the limitations imposed by the city's street system and environmental impact on the neighborhood.

"5) Parking

"Policy: Provide adequate parking for residents around their homes." (Haight Ashbury Improvement Association/Haight Ashbury Neighborhood Council)

RESPONSE

Most issues concerning new medical facilities and San Francisco's over-developed health care system, and the compatibility of the proposed USF power plant with the surrounding residential community, are issues not directly related to the Park Hill Residential project. These issues would be within the scope of specific environmental review for the UCSF and USF projects; (see the response under c. Master EIR For Cumulative Development in the Haight Ashbury Area, p.206 below). Issues concerning the proposed zoning reclassification to allow a greater development density on the project site, local traffic and parking problems, and consistency of the project with policies outlined in the Department of City Planning's July, 1973 "Improvements for the Haight Ashbury" are directly relevant to the project. Zoning reclassification issues are addressed in Section IV.E. Growth Inducement, pp. 68-69 of the EIR. Further discussion appears in the Response under Section 11. GROWTH INDUCEMENT, a. Zoning Reclassification, pp. 171-173. These discussions conclude that the proposed rezoning would allow a development density on the project site that would be between 108% and 285% of the actual density of development within 300 ft. of the site. This increased density could encourage rezoning of nearby vacant lots to higher potential densities, which could eventually alter the character of the Park Hill neighborhood.

Local traffic and parking effects are discussed on pp. 52-63 of the Draft EIR. For reasons given in the Response above under a. Physical Effects of Cumulative Development in the Greater Haight Ashbury Area, parking associated with the Park Hill Residential project would be unlikely to affect parking demand in the vicinity of UCSF. However, the proposed UCSF projects, in combination with the project and other cumulative development in the Haight Ashbury area, would contribute to increases of about 0.3% in traffic volumes along Haight, Oak and Fell Sts.

The Park Hill Residential project would change the character of the surrounding neighborhood. Because the proposed project would occur largely in existing buildings, the physical scale of the site would not be changed substantially; this would conform in part to the policy of preserving the "existing scale" of the area. The project would not include low- and moderate-income family housing, and therefore would not

X. Summary of Comments and Responses

address the "neighborhood needs" recommendation and the objective of encouraging social diversity. The market-rate units proposed for the project would be consistent with housing available in the vicinity of the Park Hill project, which is all market rate.

The more general concern for controlling large institutional expansions in the Haight Ashbury area is difficult to quantitatively address at this time, largely because few proposals have progressed beyond preliminary planning stages (see the Response under a. Physical Effects of Cumulative Development in the Greater Haight Ashbury Area, above). Neither the "Hospitals and Universities" policy nor the "Institutions" policy quoted in the Comment are directly applicable to the project. The "Residential Protection" policy primarily contains recommendations for physical changes to existing street systems which can only be made by the Department of Public Works. The project would not be responsive to the intent of the policy as it would increase traffic, and possibly exacerbate traffic hazards in the vicinity of the project. This hazard would be mitigated in part by the installation of a stop sign and pavement markings at the intersection of Park Hill Ave. and Roosevelt Way, which has impaired lines-of-sight (see the second mitigation measure on p. 71 of the Draft EIR).

The project would not be fully responsive to the "Parking" policy, requiring "adequate parking for residents around their homes." Proposed on-site parking, in combination with existing curbside parking on Buena Vista Ave. East, would accommodate the project's maximum projected parking demand. As stated on p. 3 of the Draft EIR, there could be competition for curbside spaces, and existing Park Hill Avenue residents might not always be able to park directly in front of their homes.

c. Master EIR for the Greater Haight Ashbury

COMMENTS

"In light of the concerns stated herein and the number, size and geographic distribution of development projects in the planning process, under construction or already completed in the Greater Haight Ashbury, we believe the following actions are clearly called for and should be immediately undertaken by the Department of City Planning:

"1) All available information on every project or change of use planned for the Greater Haight Ashbury should be assembled in one body and made available to all concerned community organizations and interested residents.

"2) The Planning Commission shall initiate an Environmental Impact Report (completion: 6 months) to incorporate and evaluate all of the projects in this defined geographic area, in order that the Planning Department, the Planning Commission, neighborhood organizations and individuals will have adequate information with which to analyze, review and respond to the entire projected development scenario for this area.

"3) While the above two measures are being acted upon, a moratorium should be instituted on all large development projects in this area. This shall hold until the EIR is received.

X. Summary of Comments and Responses

"The Greater Haight Ashbury, a sister collection of communities which includes the Haight, the Inner Sunset, Buena Vista / Park Hill / Mt. Olympus / Ashbury Heights and the Stanyan-Fulton Neighborhood, is one of San Francisco's vibrant, vital and unique inner city areas. It is our firm conviction that a thorough planning and review process on the development of our area is not only in our interest as active participants in and appreciators of this community, but also in the best interest of our city, which has as one of her strongest features the vitality and diversity of her neighborhoods." (Haight Ashbury Improvement Association/Haight Ashbury Neighborhood Council).

"I would ask the rest of you to cast a sympathetic eye on we who must live with your decision. I would ask you to stop this and all the other projects until a Cumulative Environmental Impact Report is done and made available to the public." (Janice Windborne)

RESPONSE

The Draft EIR on this specific project, does not, and need not, evaluate all possible project proposals for the Greater Haight Ashbury. Delaying an action on the Park Hill Residential project until a Master Plan or Master EIR is completed for the Greater Haight Ashbury is a position about project approval and is a policy question beyond the scope of this EIR. Analysis of proposed projects that are likely to be built and which in combination with the Park Hill project would have cumulative effects has been added to the EIR (see response on pp. 197-201).

16. MISCELLANEOUS

COMMENTS

... we would like to note that the draft EIR by law requires that it be made available for public comment. By using technical terms without providing a glossary of definitions or without providing the formulas used to arrive at certain statistical conjectures, the draft EIR fails to be fully accessible to the layperson. It was only through significant personal effort and outside assistance that we were able to critique this report in an educated manner. (CRD, pp. 14-15)

"... this EIR study says what it's supposed to say -- that is, the developer wants to do something reasonable and try to stay within the means of the neighborhood people without being a detriment to the neighborhood.

"... I would like to support this EIR, because I think it looks at it objectively. I think the only thing that would make the opponents of the EIR happy is if they were able to write their own EIR." (Graham Bryan)

"p. 93 -- Tosta should be identified as associated with the developers' law firm. (CRD, p. 62)

RESPONSE

Without referring to specific terms that were difficult to understand, this comment cannot be responded to fully. Generally, any calculations not explained in the text, are explained in the Appendices; also all back-up calculations and reference materials are provided in the project file which is available for public review at the Office of

X. Summary of Comments and Responses

Environmental Review, 450 McAllister St., 5th Floor, San Francisco. To further assist the reader of the EIR, the following list of technical terms has been added as footnotes to the appropriate sections of the EIR.

The following footnote references will be inserted in the text after the defined term. The footnotes that these references displace will be renumbered.

Footnotes to be added to the EIR:

Project Description, p. 24;

"/3/ Planned Unit Development (PUD) is defined by section 303 of the City Planning Code. The Code requires that a Planned Unit Development project be developed on sites of at least 1/2 acre. These projects must be developed as integrated units and designed to produce an environment of stable and desirable character which will benefit the occupants, the neighborhood and the City as a whole. Section 304 (a) of the City Planning Code further provides that, "In cases of outstanding overall design, complementary to the design values of the surrounding area, such a project may merit a well-reasoned modification of certain of the provisions" of the Planning Code."

Visual Quality and Shadows, p. 30:

"/2/ Spanish Renaissance Revival Style refers to an architectural style which consists of the adaptation and development of Renaissance Architecture originating in Italy. Re-use of classical orders and a symmetrical composition is typical of these buildings. Characteristics include finely cut ashlar masonry, framed windows with mouldings, and doors supporting entablatures or pediments. Adobe bricks are commonly used for construction."

Transportation, Circulation and Parking, p. 35, add to existing note /1/:

"/1/ Peak-hour refers to the most heavily traveled hours, which occur between 7:00 a.m. and 9:00 a.m. in the mornings and 4:00 p.m. and 6:00 p.m. in the afternoons."

Impact Section: Transportation, Circulation and Parking, p. 61:

"/2/ A trip end is the origin or destination of a person-trip. Each person trip has two ends."

"/5/ Person trip end refers to a trip end made by one person by any mode of travel (i.e. transit, walking, auto and bicycle). See also the definition of trip end in note /2/ above."

"/8/ A vehicle trip end is the origin or destination of a vehicle trip. Each vehicle trip has two ends."

The comments above concerning the general nature of the EIR are noted. However, these comments do not solicit specific revisions to the EIR and therefore cannot be responded to in this document.

Timothy Tosta has been added to p. 208 of the EIR under LEGAL COUNSEL FOR THE PROJECT SPONSOR.

XI. EIR AUTHORS AND CONSULTANTS; ORGANIZATIONS AND PERSONS CONSULTED

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● XIII. FINAL EIR CERTIFICATION MOTION

Park Hill Residential
82.358 ECZ
June 30, 1983

CERTIFICATION MOTION FINAL

ADOPTING FINDINGS RELATED TO THE CERTIFICATION OF A FINAL ENVIRONMENTAL IMPACT REPORT FOR A PROPOSED OFFICE BUILDING LOCATED AT 355 Buena Vista Ave. East.

MOVED, that the San Francisco City Planning Commission ("Commission") hereby CERTIFIES the Final Environmental Impact Report identified as "Park Hill Residential", case file no. 82.358 ECZ based upon the following findings:

1. The City and County of San Francisco, acting through the Department of City Planning ("Department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code Section 21000 et seq., "CEQA"), the State CEQA Guidelines (Cal. Admin. Code Title 14, Section 15000 et seq., "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code ("Chapter 31").

a. The Department determined that an EIR was required and provided public notice of the determination by publication in a newspaper of general circulation on October 15, 1982.

b. On March 25, 1983, the Department published the Draft Environmental Impact Report ("DEIR") and provided public notice in a newspaper of general circulation of the availability of DEIR for a public review and comment period of 34 days and of the date and time of the City Planning Commission public hearing on the DEIR; the notice was mailed to the Department's list of persons requesting such notice.

c. Notices of availability of the DEIR and of the date and time of the public hearing were posted near the project site by department staff on March 28, 1983.

d. On March 25, 1983, copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, to adjacent property owners, and to other government agencies.

2. The City Planning Commission held a duly advertised public hearing on said Draft Environmental Impact Report on April 28, 1983, at which opportunity was given for, and public comment received on the DEIR.

3. The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the public review period, prepared additions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR. This material was presented in a "Draft Summary of Comments and Responses", published on June 20, 1983, was distributed to the Commission and to all parties who commented on the DEIR, and was available to others upon request at Department offices.

4. A Final Environmental Impact Report has been prepared by the Department, based upon the Draft Environmental Impact Report, any consultations and comments received during the review process, any additional information that became available, and the Summary of Comments and Responses, all as required by law.

5. Project Environmental Impact Report files have been made available for review by the City Planning Commission and the public and these files are part of the record before the Commission.

6. On June 30, 1983 the Commission reviewed the Final Environmental Impact Report and found that the contents of said report and the procedures through which the Final Environmental Impact Report was prepared, publicized and reviewed comply with the provisions of the California Environmental Quality Act, the Guidelines of the Secretary for Resources and Chapter 31 of the San Francisco Administrative Code.

7. The City Planning Commission hereby does find that the Final Environmental Impact Report concerning 82.358 ECZ: Park Hill Residential is adequate, accurate and objective, and that there are no significant revisions to the Draft Environmental Impact Report, and does hereby CERTIFY THE COMPLETION of said final Environmental Impact Report in compliance with the California Environmental Quality Act and the State Guidelines.

8. The Commission, in certifying the completion of said Final Environmental Impact Report, hereby does find that the proposed project to be presented to the Planning Commission for consideration and approval will not have a significant effect on the environment.

I hereby certify that the foregoing Motion was ADOPTED by the City Planning Commission at its regular meeting of June 30, 1983.

Lee Woods, Jr.,
Secretary

AYES: Klein, Nakashima, Salazar, Wortman, Wright

NOES: Bierman

ABSENT: Rosenblatt

PASSED: June 30, 1983

XIV. APPENDICES

LIST OF APPENDICES

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APPENDIX A: FINAL INITIAL STUDY*

*Differences among data presented in the following Initial Study and the preceding EIR are attributable to the availability of additional or more precise information during the subsequent preparation of the EIR.



DEPARTMENT OF CITY PLANNING

NOTICE THAT AN ENVIRONMENTAL IMPACT REPORT IS DETERMINED TO BE REQUIRED

Date of this Notice: October 22, 1982

Lead Agency: City and County of San Francisco, Department of City Planning
450 McAllister St., 5th Floor, San Francisco, CA 94102

Agency Contact Person:

Tel: 415/558-5261

Project Title: 82.358E Park Hill
Residential

Project Sponsor: Park Hill Joint Venture.

Project Contact Person: Stephen R. Koch

Project Address: 355 Buena Vista Avenue East

Assessor's Block(s) and Lot(s): 2607/1 & 1A

City and County: San Francisco

Project Description: Development of a 200-unit Planned Unit Development (PUD) involving the adaptive reuse of the former St. Joseph's Hospital site and the construction of 47 new residential units. The St. Joseph's Hospital buildings, consisting of a hospital, convent and chapel, would be converted into 153 residential units.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15081 (Determining Significant Effect), 15082 (Mandatory Findings of Significance) and 15084 (Decision to Prepare an EIR), and the following reasons, as documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

Deadline for Filing of an Appeal of this Determination to the City Planning Commission: November 1, 1982.

An appeal requires 1) a letter specifying the grounds for the appeal, and 2) a \$35.00 filing fee.

A handwritten signature in cursive script that reads "Alec S. Bash".

Alec S. Bash, Environmental Review Officer

ENVIRONMENTAL EVALUATION CHECKLIST
(Initial Study)

Project File No : 82.358E

Title : Park Hill Residential

Address : 355 Buena Vista Avenue East Assessor's Block and Lot : 2607/1 & 1A

I. PROJECT DESCRIPTION

Site History

The 2.5-acre (110,000 sq. ft.) project site, on the southeast edge of Buena Vista Hill, consists of the buildings and grounds of the former St. Joseph's Hospital (see Figure 1, p. 102). The hospital was founded in 1889 and the existing hospital complex was built between 1920 and 1928. It consists of a hospital, a convent and a chapel. In 1979 the hospital was closed as a part of a citywide plan to consolidate medical services. The project would retain all existing buildings on site. New construction would occur on what is now a parking lot, the site of the 1889 hospital building that was demolished in 1926. Southwest of the hospital building is the St. Joseph's College of Nursing building. On September 30, 1982 the City Planning Commission approved the remodeling of the College of Nursing into a 40-unit bed and care facility, a hospice, and ancillary offices. The College of Nursing is not included in the project site or the project sponsor's interests.

Proposed Development

Park Hill Joint Venture proposes to develop a 200-unit Planned Unit Development (PUD) involving the adaptive reuse of three existing buildings and the construction of 47 new units (see Figure 2, p. 103). The St. Joseph's Hospital buildings would be converted into 153 studio, one- and two- bedroom residential units (about 112,000 net sq. ft.): the six-story hospital building would contain 112 units, the six-story convent building would contain

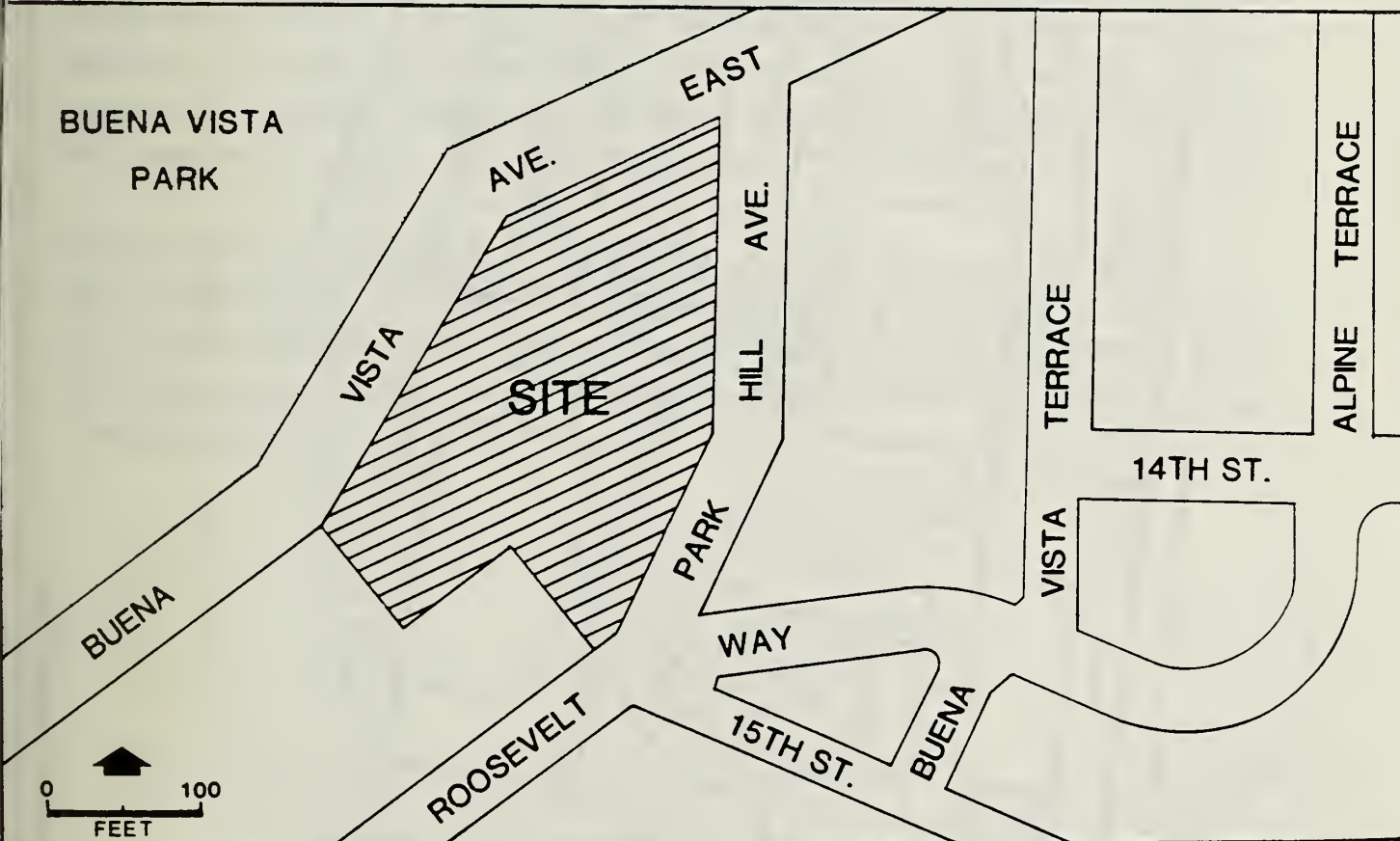
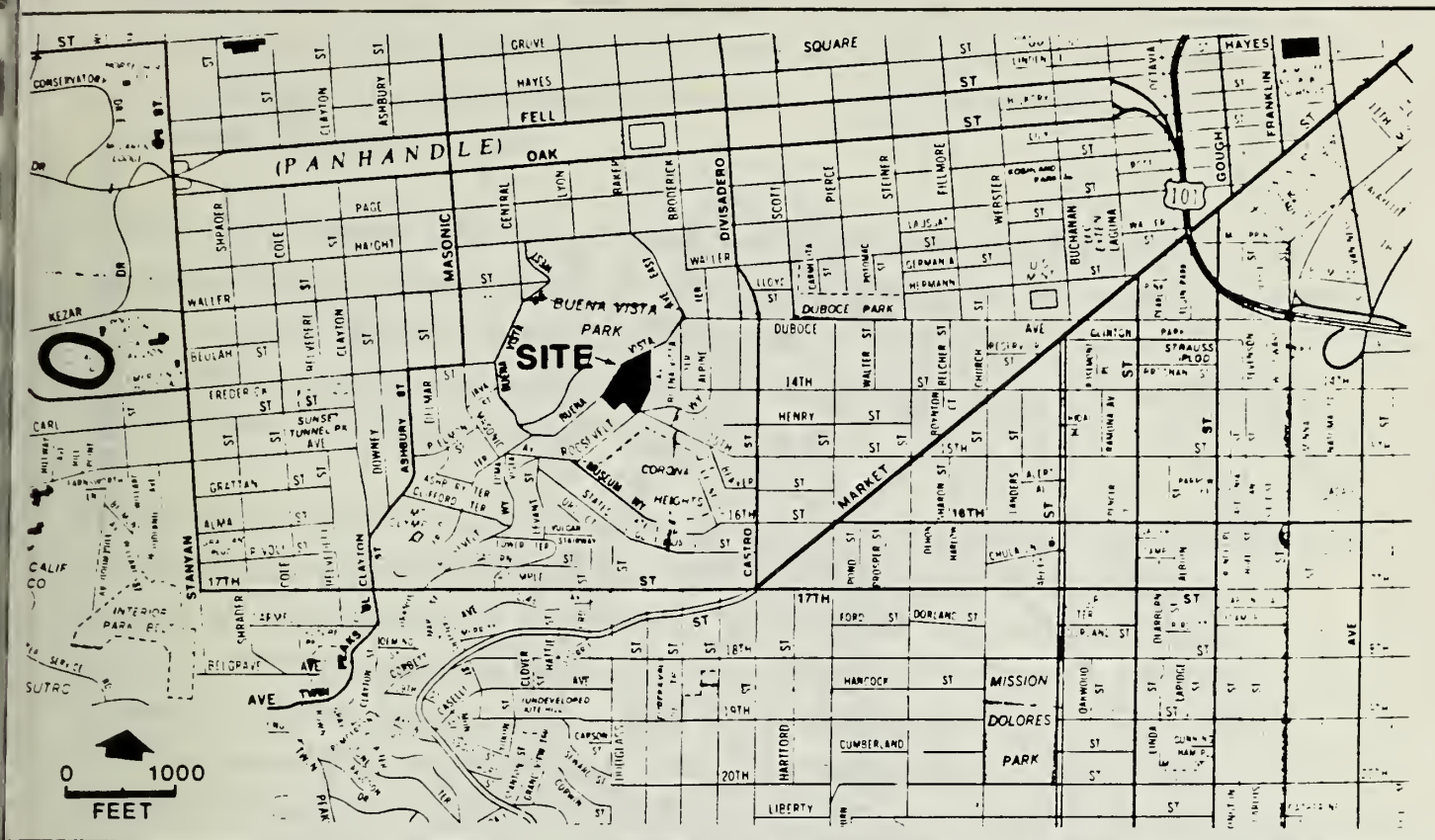


FIGURE 1: Project Site and Vicinity

SOURCE: Environmental Science Associates, Inc.

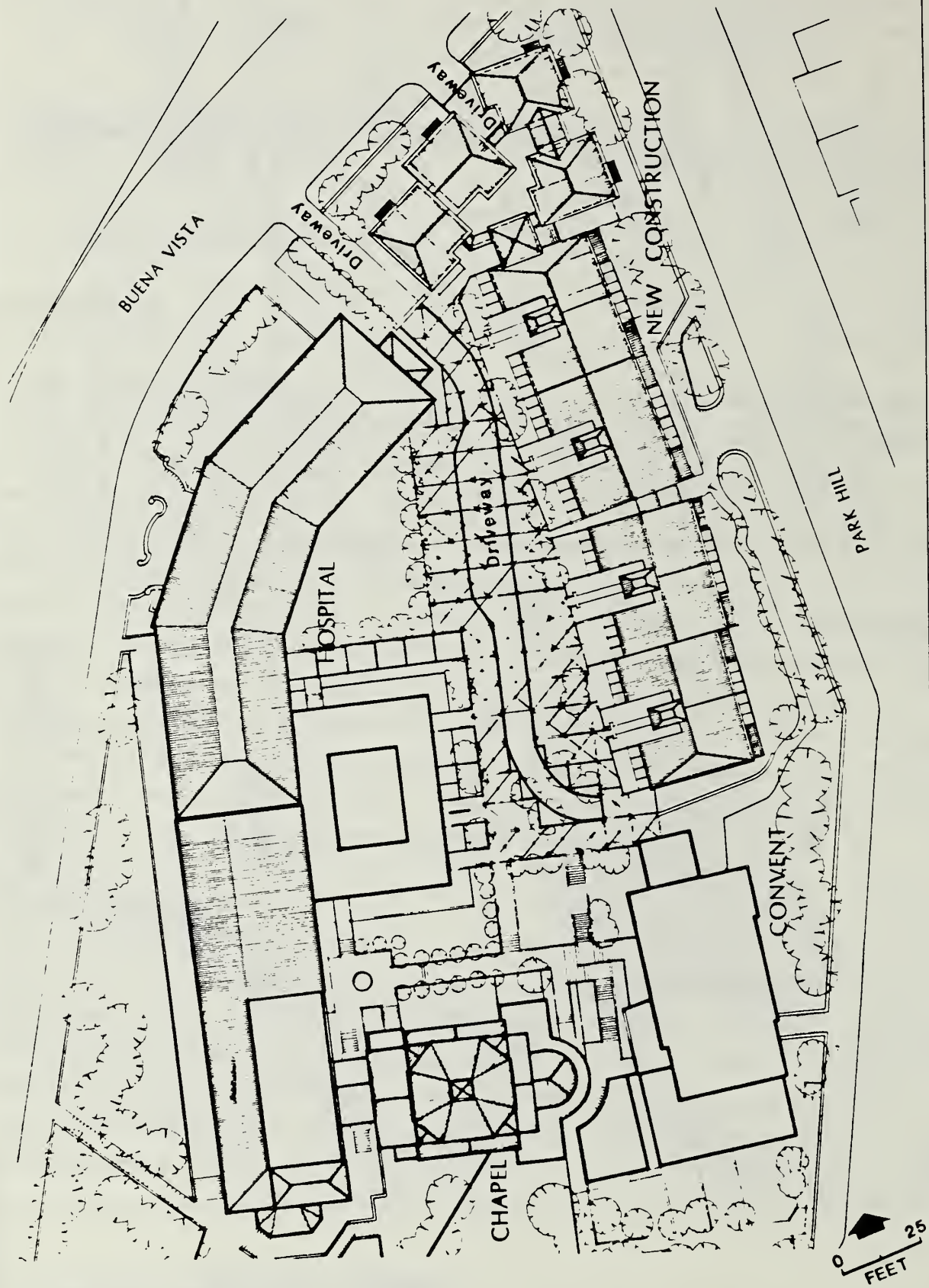


FIGURE 2: Site Plan

34 units and the chapel would contain 7 units. The exterior of the three buildings would remain essentially the same, although some of the windows would be enlarged and some balconies would be added, if feasible, to accommodate residential uses.

A three- and four-story building containing 47 new one- and two-bedroom unit townhouses (about 39,000 net sq. ft.) would be constructed on the project site along Park Hill Avenue, southeast of the hospital buildings. The new construction would be designed to complement the colors and architectural style of the existing buildings.

Vehicular access to the project would be on Buena Vista Avenue East through a driveway located immediately adjacent to the former hospital building and through an entrance west of the intersection of Park Hill and Buena Vista Avenues. From the hospital entrance, cars would pass through an interior driveway to a ramp leading to two hundred, self-park parking spaces provided in three sub-surface parking levels under the townhouse structure. This garage would also be directly accessible from the entrance near Park Hill and Buena Vista Avenues. There are about 65 on-street parking spaces located on Buena Vista Avenue East immediately in front of the hospital building. Those spaces are currently used by administrative employees of Children's Hospital who temporarily work in the hospital building.

Approximately 10,000 sq. ft. of open space, including an interior courtyard and landscaping in the theme of a Mediterranean courtyard would be provided. The project perimeter would be extensively landscaped, especially along Park Hill Avenue, to provide a visual buffer between Park Hill Avenue and the new construction.

II. SUMMARY OF POTENTIAL ENVIRONMENTAL EFFECTS

Potential Environmental Impacts

The project potentially could have significant environmental effects in the areas of transportation, including parking demand; visual quality, including and shadow effects of the new construction on Park Hill Avenue; demand for neighborhood recreation services; and consumption of energy resources. These impacts would be due to the increased density and scale on the site. These issues will be examined in an Environmental Impact Report (EIR) that will be prepared for the project.

Effects Found Not To Be Significant

The proposed project was examined in this initial study and some potential impacts were determined to be either insignificant, or would be mitigated through measures incorporated into the project design. They include:

Land Use. The project would change the uses on the site from under-used institutional to residential. The use category would be consistent with the surrounding neighborhood.

Population/Employment/Housing. The project would increase the population in the area by about 300 persons. Increased transportation, recreation demand and visual quality effects associated with increased residential population at the site will be addressed in the EIR (see above). It would provide about 160 person-years of construction employment and up to five permanent jobs.

Noise. After completion, the project would not increase audible noise levels in the project vicinity. Temporary construction noise effects would be mitigated by the measures discussed on p. 111.

Air Quality/Climate. The project would not be expected to cause a violation of standards and would not result in measurable increases in local ambient concentrations during either project construction or occupancy.

Utilities and Public Services. The increased demand for public services and utilities attributable to the project would not require additional personnel or equipment. Mitigation measures have been included in the proposed project that would limit demand for public services and utilities (see pp. 114-117).

Biology. The project would have a negligible effect on plant or animal life or habitats.

Land. A preliminary geotechnical report prepared for the site indicates that there would be no problems in site development.

Water. The project would not alter drainage patterns. Water mains serving the project would be adequate to meet water demand generated by the project.

Hazards. The project would neither cause nor be affected by hazardous uses or health hazards.

Cultural. No known archeologic or historic resources are present on the site. See pp. 121-122 for a mitigation measure to be implemented in the event archaeological resources are discovered on the site during project construction.

III. ENVIRONMENTAL CHECKLIST

A. GENERAL CONSIDERATIONS	<u>YES</u>	<u>MAYBE</u>	<u>NO</u>	<u>N/A</u>	<u>DISC</u>
1. Would the project conflict with objectives and policies in the Comprehensive Plan (Master Plan) of the City :	<u> </u>	<u> </u>	<u> X </u>	<u> </u>	<u> X </u>
2. Would the project require a variance, or other special authorization under the City Planning Code?	<u> X </u>	<u> </u>	<u> </u>	<u> </u>	<u> X </u>
3. Would the project require approval of permits from City Departments other than DCP or BBI, or from Regional, State or Federal Agencies?	<u> </u>	<u> </u>	<u> X </u>	<u> </u>	<u> </u>
4. Would the project conflict with adopted environmental plans and goals?	<u> </u>	<u> </u>	<u> X </u>	<u> </u>	<u> </u>

The proposed project would respond to several major City and State policies and provisions of the San Francisco Master (Comprehensive) Plan. It would provide about 200 new infill housing units to help meet the demand for housing generated by Downtown office expansion, a priority advanced by the Mayor in her six-point program for expanding housing in San Francisco, April 9, 1982, and the State of California's Urban Action Program, which encourages the construction of new affordable housing in urban areas, especially on infill sites. It would also respond to Objective 2, Policy 2 of the Residence Element (December 1975) by converting underused non-residential land to residential use. The project would not provide low- and moderate-income housing; preservation and expansion of such housing is Objective 4, Policy 1 of the Residence Element (December 1975).

The project site is currently zoned RH-2 (House, Two-Family) and would be proposed for a zoning reclassification to RM-2 (Mixed, Moderate Density). The project sponsor would also apply for a Conditional Use authorization for a Planned Unit Development (PUD) under the provisions of Sections 303 and 304 of the City Planning Code. Reclassification of the site to a RM-2 district/PUD would allow development of a maximum of 274 units, 74 more than proposed in the project. Without a PUD, RM-2 reclassification of the site would permit development of 183 units or 17 units less than the proposed development.

Development of the site with a Conditional Use authorization under the existing RH-2 district and without a PUD, would allow development of about 73 units, 127 fewer than the project. The RH-2 district classification with a PUD would permit development of 109 units, which would be 91 fewer units than are proposed.

Subdivision approval would be required prior to the sale of the condominiums, pursuant to Sections 1303 (c) of the Subdivision Code, Chapter XIII of Part II of the San Francisco Municipal Code.

B. ENVIRONMENTAL IMPACTS :

1. Land Use. Would the proposed project :

	<u>YES</u>	<u>MAYBE</u>	<u>NO</u>	<u>N/A</u>	<u>DISC</u>
a. Be different from surrounding land uses?	<u> </u>	<u> </u>	<u> X </u>	<u> </u>	<u> X </u>
b. Disrupt or divide the physical arrangement of an established community?	<u> </u>	<u> </u>	<u> X </u>	<u> </u>	<u> X </u>

The proposed project would change the uses on the site from institutional (the former St. Joseph's Hospital) to residential. The properties to the east, the south and the southwest are a mixture of one- and two-story, single family and multi-family residential units. The project, as a residential use, would be similar to surrounding land uses. As a complex with multiple units per building, the Park Hill project would differ from the style and character of immediately surrounding residential uses. Multi-story apartment buildings exist at other locations along Buena Vista Avenue. Under current project plans, no major buildings would be demolished on the site and the project would not disrupt the physical arrangement of the Buena Vista neighborhood.

2. Visual Quality and Urban Design.

Would the proposed project :

	<u>YES</u>	<u>MAYBE</u>	<u>NO</u>	<u>N/A</u>	<u>DISC</u>
a. Obstruct or degrade any scenic view or vista open to the public?	<u> </u>	<u> </u>	<u> X </u>	<u> </u>	<u> X </u>
b. Reduce or obstruct views from adjacent or nearby buildings?	<u> </u>	<u> X </u>	<u> </u>	<u> </u>	<u> X </u>
c. Create a negative aesthetic effect?	<u> </u>	<u> </u>	<u> X </u>	<u> </u>	<u> </u>
d. Generate light or glare affecting other properties?	<u> </u>	<u> </u>	<u> X </u>	<u> </u>	<u> </u>

The proposed project would be located on the southeast slope of Buena Vista Hill where expansive views of the City to the south and southeast are available from the site and vicinity. The project would not obstruct any major scenic views or vista now available to the public. The hospital complex is highly visible as a linear ochre structure situated against the green vegetation backdrop of Buena Vista Park; its visual character would remain essentially unchanged as the existing buildings would be retained.

New construction of the 47 townhouse units along Park Hill Avenue could be visible from nearby residences; this potential impact will be examined in the EIR.

3. Population/Employment/Housing. Would the proposed project:

	<u>YES</u>	<u>MAYBE</u>	<u>NO</u>	<u>N/A</u>	<u>DISC</u>
a. Alter the density of the area population?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>	<u>X</u>
b. Have a growth-inducing effect?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
c. Require relocation of housing or business, with a displacement of people, in order to clear the site?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
d. Create or eliminate jobs during construction and operation and maintenance of the project?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
e. Create an additional demand for housing in San Francisco?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>	<u> </u>

The project would increase the population in the area by adding approximately 300 persons to a site which has no residents (based on an expected average household size of 1.5). It is unlikely that the project would encourage additional residential development as the surrounding neighborhood is already predominantly residential and potential nearby development sites are limited.

If approved, the proposed zoning reclassification from RH-2 to RM-2/PUD could set a precedent to reclassify several lots south of the site which are owned by St. Joseph's Hospital to a higher density district than the existing RH-2.

The project would provide about 160 person-years of employment during the 24-month construction period and generate up to five permanent jobs for management and maintenance of the residential development. No jobs would be eliminated due to construction of the project. Employees of Children's Hospital currently working at the site would be transferred to offices in the vicinity of Children's Hospital, located at 3700 California Street.

4. Transportation/Circulation. Would the construction or operation of the project result in:

	<u>YES</u>	<u>MAYBE</u>	<u>NO</u>	<u>N/A</u>	<u>DISC</u>
a. Change in use of existing transportation systems? (transit, roadways, pedestrian ways, etc)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
b. An increase in traffic which is substantial in relation to existing loads and street capacity?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c. Effects on existing parking facilities, or demand for new parking?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
d. Alteration to current patterns of circulations or movement of people and/or goods?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
e. Increase in traffic hazards to motor vehicles, bicyclists or pedestrians?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
f. A need for maintenance or improvement or change in configuration of existing public roads or facilities?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
g. Construction of new public roads?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>	<u> </u>

The effects of the project on local traffic, parking demand and public transit will be examined in the EIR. The EIR will also evaluate the cumulative transportation effects of the proposed Park Hill project and approved development at the adjacent College of Nursing (see Site History, p. 101).

5. Noise.

	<u>YES</u>	<u>MAYBE</u>	<u>NO</u>	<u>N/A</u>	<u>DISC</u>
a. Would the proposed project result in generation of noise levels in excess of those currently existing in the area?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>	<u>X</u>
b. Would existing noise levels impact the proposed use?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
c. Are Title 25 Noise Insulation Standards applicable?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>	<u>X</u>

Background noise levels in the project vicinity are 60 Ldn./1/ Project-generated traffic would not increase exterior noise levels on any road segment in the project vicinity by more than 1 dBA with the exception of Roosevelt Way where traffic related noise would be increased by 4 dBA, from 52 to 56 dBA./2,3/ However, at 56 dBA, ambient (or background) noise would be dominant thereby masking the increase of 4 dBA due to traffic. The increase in traffic on Buena Vista Avenue East and Park Hill Avenue would be noticeable as there would be more frequent single noise events of passing vehicles. On Buena Vista Avenue East, single noise events from passing vehicles would increase to 1 every 15 seconds instead of 1 every 20 seconds as currently occurs. On Park Hill Avenue, the increase would be to 1 vehicle passing every 1 1/2 minutes, instead of the current 1 every 2 minutes. These increased single noise events would not cause ambient noise levels (the L_{dn} or CNEL) on these streets to increase by greater than 1 dBA. A 1 dBA increase in environmental noise is generally undetectable to the untrained human ear.

Title 25 of the California Administrative Code applies to all new residential structures with the exception of single family detached dwellings. It requires that an interior noise environment be maintained at a CNEL of 45 dBA. The acceptable outdoor noise level for residential units is established as a community noise equivalent level (CNEL) of 60 dBA./4/ Should the exterior noise environment exceed a CNEL of 60 dBA, an acoustical analysis would be required to demonstrate that the interior CNEL requirement of less than 45 dBA with the windows closed would be met. The project sponsor would design the project to meet Title 25 noise insulation standards.

Construction noise associated with site development would intermittently increase noise levels in the project vicinity during the 24-month construction period. Several measures have been included in the proposed project to mitigate potential noise effects during the construction period. Enclosures or barriers would be provided, if necessary, for all stationary construction equipment to decrease noise levels. The entire construction site would be enclosed with a wooden fence.

The general contractor would, as necessary, muffle and shield intakes and exhausts, shroud or shield impact tools, and use electric-powered rather than diesel-powered construction equipment. Construction would be limited to the daylight hours to minimize disturbance to nearby residents except in the case of emergencies.

NOTES

/1/ Noise Element, San Francisco Comprehensive Plan, L_{dn} , the day night average noise level, is a noise measurement based on human reaction to cumulative noise exposure over a 24-hour period, taking into account the greater annoyance of nighttime noises (noise between 10 p.m. and 7 a.m. is weighted 10 dBA higher than daytime noise).

/2/ MAG Consultants, Technical Report for the Noise Element for the General Plan of the City of San Bruno.

/3/ dBA is the measurement of sound units in decibels (dB). The "A" denotes the A-weighted scale which simulated the response of the human ear to various frequencies of sound.

/4/ Community noise equivalent level (CNEL) is an averaged sound level measurement based on human reaction to cumulative noise over a 24-hour period. The numerical values of CNEL and L_{dn} are essentially equal for most urban noise environments.

6. Air Quality/Climate. Would the proposed project result in:

	<u>YES</u>	<u>MAYBE</u>	<u>NO</u>	<u>N/A</u>	<u>DISC</u>
a. Violation of any ambient air quality standard or contribution to an existing air quality violation?	___	___	<u>X</u>	___	<u>X</u>
b. Exposure of sensitive receptors to air pollutants?	___	___	<u>X</u>	___	___
c. Creation of objectionable odors?	___	___	<u>X</u>	___	___
d. Burning of any materials including brush, trees, or construction materials?	___	___	<u>X</u>	___	___
e. Alteration of wind, moisture, or temperature (including sun shading effects), or any change in climate, either locally or regionally?	___	___	<u>X</u>	___	___

Increases in traffic generated by the proposed project would add to the regional accumulations of pollutants. Based on preliminary traffic generation estimates, a roadside carbon monoxide (CO) analysis was carried out for worst-case meteorology and dispersion conditions for Buena Vista Avenue East and Park Hill Avenue (those roads showing greatest increases due to the project). The analysis found the project would increase roadside CO concentrations by 2% for Buena Vista Avenue East to 9.8 parts per million

(ppm) and 5.3 ppm for 1-hour and 8-hour averages. CO concentrations would also be expected to be 9.1 ppm and 5.2 ppm on Park Hill Avenue for one-hour and eight hour averages increases of 1% and 2%, respectively. All of these values are well within the standards of 35 ppm and 9 ppm, respectively, for 1-hour and 8-hour averages of CO.

Construction of the proposed project would have short-term effects on air quality in the project vicinity. Demolition, excavation, and other construction activities would generate particulate (dust) that would affect local air quality for the duration of such activities. The State 24-hour total suspended particulate standard of 100 micrograms per cubic meter would probably be violated on and adjacent to the site several times during these activities. Dust may fall on surfaces within 200 to 800 ft. of the project site under low winds. Blowing dust may be an annoyance in the vicinity when winds exceed 12 miles per hour. Except to persons with respiratory problems, particulates are more of a nuisance than a hazard.

Asphalt, oil-based architectural coatings, and paints, if used in construction, would emit hydrocarbons. Hydrocarbon emissions are controlled by Bay Area Air Quality Management District (BAAQMD) Regulations 3 and 9. Diesel-powered construction equipment would emit (in decreasing order by weight) nitrogen oxides, carbon monoxide, sulfur oxides, hydrocarbons, and particulate./1/

During excavation, unpaved demolition and construction areas would be wetted to reduce dust emissions. The general contractor would maintain and operate construction equipment in such a way as to reduce exhaust emissions.

NOTES

/1/ U.S. Environmental Protection Agency, 1975, Compilation of Air Pollutant Emission Factors.

7. Utilities and Public Services. Would the proposed project:

- a. Have an effect upon, or result in a need for new or altered, governmental services in any of the following?

	<u>YES</u>	<u>MAYBE</u>	<u>NO</u>	<u>N/A</u>	<u>DISC</u>
fire protection	—	—	<u>X</u>	—	<u>X</u>
police protection	—	—	<u>X</u>	—	<u>X</u>
schools	—	—	<u>X</u>	—	<u>X</u>
parks or other recreational facilities	—	<u>X</u>	—	—	<u>X</u>
maintenance of public facilities	—	—	<u>X</u>	—	<u>X</u>
power or natural gas	—	—	<u>X</u>	—	<u>X</u>
communications systems	—	—	<u>X</u>	—	<u>X</u>
water	—	—	<u>X</u>	—	<u>X</u>
sewer/storm water drainage	—	—	<u>X</u>	—	<u>X</u>
solid waste collection and disposal	—	—	<u>X</u>	—	<u>X</u>

Time of first response to the site is about two minutes from Fire Station 21, located at 1443 Grove St. The project would incorporate all emergency response systems stipulated by the Life Safety Code including fire alarms and smoke detectors. These measures would reduce hazards to building occupants during an earthquake or fire. The project itself would not generate a need for additional personnel or equipment in order to serve the site. (Edward J. Phipps, Assistant Chief, San Francisco Fire Department, written communication, July 29, 1982).

The site is within the northeast corner of the San Francisco Police Department's Mission District Reporting Area, which is roughly bounded by Buena Vista Avenue East, Duboce Avenue, Potrero Avenue, Army Street, Douglas Street, Portola Drive, and Twin Peaks Boulevard. The site is in Plot 528 (bounded by the west side of Buena Vista Avenue East, Duboce Avenue, Castro Street, 17th Street, and Roosevelt Way) of the Mission District Reporting Area. Plot 528 has a low crime rate compared to the Mission District Reporting Area and a low to average crime rate when compared to the City as a whole. Response time is two to three minutes for high priority calls (robbery, rape and assault in progress). At this time, the Police Department does not anticipate the need for additional equipment or personnel to serve the project (Sergeant Libert, Planning and Research Division, San Francisco Police Department, telephone communication, July 26, 1982 and written

communication, August 2, 1982). To reduce the demand on police services, the project would incorporate internal security measures such well-lighted entries; alarm systems; and locked entrances with security telephones.

The project probably would have some school age children as residents. San Francisco public schools have experienced declining enrollments over the past several years and could accommodate an increase in school age children from the project (San Francisco Unified School District, Proposal for Leasing and Selling Vacant Property, April 29, 1980, pp. 28-29).

Although on-site recreation facilities would be provided, the project may increase the demand for public recreation services in the Buena Vista neighborhood. This will be examined in the EIR for the project.

The increased traffic volumes generated by the project would result in additional wear on local streets. Property tax revenues generated by the project to the City's General Fund would offset added costs of local street maintenance.

In order to serve the project, existing gas and electricity feeder lines on the site would have to be altered. PG&E has projected energy demands in its service area (which includes the Bay region) 20 years in the future, based on land use patterns and market activity. According to PG&E projections, it will have adequate supply of energy to meet the demand without the need for additional power plants not already planned (Herbert Luders, Industrial Power Engineer, telephone communication August 20, 1982, and Hudson Martin, Supervisor, Energy Economics, Economics and Statistics Department, PG&E, telephone communication, May 27, 1982).

Pacific Telephone and Telegraph Co. (PT&T) currently serves the site through underground cables extending to a main terminal. PT&T cannot determine at this time if and where new lines would need to be provided to serve the site. Street excavation to extend new telephone lines would be conducted during normal working hours; street plates would be used where appropriate to minimize effects on traffic (Norma Lyon, Engineer, Pacific Telephone and Telegraph Company, written communication, August 6, 1982).

Water demand is estimated to be roughly 40,000 gallons per day (gpd) or 200 gpd per unit. For comparison, St. Joseph's Hospital demanded roughly 76,740 gpd of water at full operation. The 8-inch diameter main on Park Hill Avenue is capable of providing 880 gallons per minute. If the consumption for the project were averaged over an 8-hour period, it would result in 83 gallons per day. Even if this average were doubled for the morning and evening peak periods, it would not tax the capacity of the system. The Department indicates that it can provide domestic and fire service subject to the limitations of the existing distribution system (Harlow Swain, Senior District Water Serviceman, San Francisco Water Department, written communication, July 29, 1982 and telephone conversation, October 21, 1982).

There is a 12-inch diameter sanitary sewer in Buena Vista Avenue East and a 8-inch diameter sewer in Park Hill Boulevard. Average wastewater generation is projected to be roughly 38,000 gallons per day (gpd). (Wastewater generation is assumed to be 95% of water consumption to account for water loss caused by evaporation, landscaping, irrigation, etc.) If St. Joseph's Hospital were to be reinstituted into full use, sewage generation would be about 56,590 gpd. The existing sewer mains are adequate to accept additional sanitary and storm flows from the Park Hill project (Nathan Lee, Clean Water Program, written communication, August 16, 1982.) The development would incorporate low-flow faucet and toilet fixtures to reduce water consumption and wastewater.

The Sunset Scavenger Company, in collaboration with Solid Waste Engineering, provides solid waste collection and disposal services to the site. Wastes are currently disposed of at a fill site in Mountain View; the contract for this site expires in 1983. Arrangements are being finalized for a 5-year contract on a site in Altamont. Solid waste generation from the project is projected to be 720 pounds per day at full buildout (Solid Waste Management Board, July 19, 1974 = 2.4 lbs/capita/day). In comparison, full operation of St. Joseph's Hospital would generate roughly 2,360 lbs per day of solid waste. The Scavenger Company could provide service to the site. The company recommends installation of trash compactors whenever possible (Leo Maionchi, Manager, Solid Waste Engineering, telephone communication, July 23, 1982). Separate storage facilities for recyclable waste material would be provided to

project residents to encourage recycling. If feasible, the project would be equipped with central trash compactors to reduce the volume of solid waste requiring storage and transport.

8. Biology.

	<u>YES</u>	<u>MAYBE</u>	<u>NO</u>	<u>N/A</u>	<u>DISC</u>
a. Would there be a reduction in plant and/or animal habitat or interference with the movement of migratory fish or wildlife species?	___	___	<u>X</u>	___	___
b. Would the project affect the existence or habitat of any rare, endangered or unique species located on or near the site?	___	___	<u>X</u>	___	___
c. Would the project require removal of mature scenic trees?	___	___	<u>X</u>	___	<u>X</u>

Much of the grounds of the existing hospital complex are paved but some landscaping, including mature trees, remains on the site. All trees would be retained at their existing locations, except for a 12-inch diameter Cypress tree that would be relocated on the site, if feasible, to accommodate the 47 units of new construction.

9. Land. (topography, soils, geology) Would the proposed project result in or be subject to:

	<u>YES</u>	<u>MAYBE</u>	<u>NO</u>	<u>N/A</u>	<u>DISC</u>
a. Potentially hazardous geologic or soils conditions on or immediately adjoining the site? (slides, subsidence, erosion, and liquefaction)	___	<u>X</u>	___	___	<u>X</u>
b. Grading? (consider height, steepness and visibility or proposed slopes; consider effect of grading on trees and ridge tops)	<u>X</u>	___	___	___	<u>X</u>
c. Generation of substantial spoils during site preparation, grading, dredging or fill?	<u>X</u>	___	___	___	<u>X</u>

The project site is in an area mapped as having potential for landslide hazards./1/ A preliminary geotechnical report conducted for the site provides a detailed description of soils and geologic hazards. That report indicates that the site is deposited with bedrock, overlain with fill, sand dune and residual clays; no problems are anticipated in site development./2/ Project would be designed to meet the requirements of the San Francisco Building Code. In addition, a detailed geotechnical and structural design report would be conducted for the buildings. This report would be submitted to the Department of Public Work's Bureau of Building Inspection and would be used in reviewing building foundation and structural plans. Site development would require excavation and grading, resulting in the removal of about 11,000 cu. yds. of spoils from the site./3/

Several procedures would be followed by the project sponsor and construction contractor to ensure adequate structural safety during project construction:

- A detailed foundation and structural design study would be conducted for the project by a California licensed structural engineer and a geotechnical consultant. The project sponsor would follow the recommendations of these studies during the final design and construction of the project.
- The project sponsor would also post a surety bond, if required by the San Francisco Department of Public Works, before issuance of a permit to excavate. Such a bond would protect the City against damages to City-owned sidewalks, streets and utilities.
- The project sponsor would require the project contractor and subcontractors to obtain Faithful Performance and Payment Bond if proper financial capability is not evident, and to be responsible for any damage to existing buildings which might result from excavation. This bond would protect the project sponsor and owners of adjacent properties should any damage to these properties result from construction activities.
- Excavation pit walls would be shored up and protected from slumping or lateral movement of soils into the pit. Shoring and sheeting with soldier beams could be used for this purpose.

- Should dewatering be necessary, groundwater observation wells would be installed for monitoring the level of the water table and other instruments would be placed to monitor potential settlement and subsidence. If, in the judgement of City engineers, unacceptable subsidence occurs during construction, groundwater recharge would be initiated to halt the settlement.
- Groundwater pumped from the site would be retained in a holding tank to allow suspended particles to settle, if this is found necessary by the Industrial Waste Division of the Department of Public Works, to prevent sediment from entering the stormdrain/sewer lines.

NOTES

/1/ Blume, John A. & Associates, San Francisco Seismic Safety Investigation, Geologic Evaluation, Figure 4. June, 1974.

/2/ Hallenbeck-McKay & Associates, Soil Investigation for St. Joseph's Hospital Additions and Structural Reinforcement to Meet Seismic Code, 1975.

/3/ William Burrows, Construction Contractor, Williams and Burrows, telephone communication, August 12, 1982.

10. <u>Water.</u> Would the proposed project result in:	<u>YES</u>	<u>MAYBE</u>	<u>NO</u>	<u>N/A</u>	<u>DISC</u>
a. Reduction in the quality of surface water?	___	___	<u>X</u>	___	___
b. Change in runoff or alteration to drainage patterns?	___	<u>X</u>	___	___	<u>X</u>
c. Change in water use?	<u>X</u>	___	___	___	<u>X</u>
d. Change in quality of public water supply or in quality or quantity (dewatering) of ground water?	___	<u>X</u>	___	___	<u>X</u>

Because the area for new construction is presently a paved parking lot, there may not be increased impervious surface on the site. Drainage patterns from the site would not be altered greatly. Water use on the site would be about 40,000 gallons per day based on a factor of 200 gallons per day per unit (Metcalf and Eddy, 1972, Wastewater Engineering: Collection, Treatment,

Disposal). Existing water mains and water supply are adequate to meet this demand (see p. 116). Because of the depth of excavation some dewatering may be necessary. However, no groundwater was encountered by test borings ranging from about 25 to 60 ft. in depth. The proposed development would be designed so that runoff is directed to landscaped portions of the site and allowed to penetrate the soil. The proposed development would be landscaped with drought-resistant native plants to decrease water required for landscape irrigation.

11. <u>Energy/Natural Resources.</u> Would the proposed project result in:	<u>YES</u>	<u>MAYBE</u>	<u>NO</u>	<u>N/A</u>	<u>DISC</u>
a. Any change in consumption of energy?	<u>X</u>	—	—	—	—
b. Substantial increase in demand on existing energy sources?	—	—	<u>X</u>	—	—
c. An effect on the potential use, extraction, conservation or depletion of a natural resource?	<u>X</u>	—	—	—	—

The project's 200 units would use approximately 46 million Btu's annually for electricity and natural gas, which is substantially less than the energy consumption of St. Joseph's Hospital complex when it was in full operation. The proposed development would contribute to cumulative energy demand in San Francisco that would result in depletion of nonrenewable energy resources. Energy consumption of the project will be addressed in the EIR.

12. <u>Hazards.</u> Would the proposed project result in:	<u>YES</u>	<u>MAYBE</u>	<u>NO</u>	<u>N/A</u>	<u>DISC</u>
a. Increased risk of explosion or release of hazardous substances (e.g., oil, pesticides, chemicals or radiation), in the event of an accident, or cause other dangers to public health and safety?	—	—	<u>X</u>	—	—
b. Creation of or exposure to a potential health hazard?	—	—	<u>X</u>	—	—
c. Possible interference with an emergency response plan or emergency evacuation plan?	—	—	<u>X</u>	—	—

13. <u>Cultural</u> . Would the proposed project?	<u>YES</u>	<u>MAYBE</u>	<u>NO</u>	<u>N/A</u>	<u>DISC</u>
a. Include or affect a historic site, structure, or building?	___	___	<u>X</u>	___	<u>X</u>
b. Include a building on any recognized list of buildings of architectural merit?	___	___	<u>X</u>	___	___
c. Include or affect a known archaeological resource or an area of archaeological resource potential?	___	___	<u>X</u>	___	___
d. Cause a physical change affecting unique ethnic or cultural values?	___	___	<u>X</u>	___	___

St. Joseph's Hospital has been located on its present site since the late 1880's. The existing buildings were built in the 1920's. All are steel framed or reinforced concrete construction with light ochre stucco facades and red tile, hipped roofs. The style is Spanish Renaissance Revival.

None of the buildings on the site are contained in the 1976 Citywide inventory of architecturally significant buildings; nor at this time have they been given any official recognition of architectural or historic merit. The project would help preserve the architectural character of the site by retaining the existing buildings on the site and by designing the new construction to compliment the color and architecture of the existing buildings.

C. MITIGATION MEASURES :

	<u>YES</u>	<u>NO</u>	<u>DISC</u>
Are mitigation measures included in the project?	<u>X</u>	___	<u>X</u>
Are other mitigation measures available?	if need is identified		

CULTURAL

- Should evidence of cultural or historic artifacts or significance be found during project excavation, the Environmental Review Officer and the President of the Landmarks Preservation Advisory Board would be notified.

The project sponsor would select an archaeologist, historian, or other expert acceptable to the Environmental Review Officer to help the Office of Environmental Review determine the significance of the find and whether feasible measures, including appropriate security measures, should be implemented to preserve or recover such artifacts. The Environmental Review Officer would then recommend specific mitigation measures, if necessary, and recommendations would be sent to the State Office of Historic Preservation. Excavation or construction which might damage the discovered cultural resources would be suspended for a maximum of four weeks to permit inspection, recommendation and retrieval, if appropriate.

D. ALTERNATIVES

YES NO DISC

Were other alternatives considered :

X X

Alternatives to the proposed project which will be analyzed in the EIR include :

1. The no-project alternative would retain existing conditions on the site. No new housing units would be added to San Francisco's housing supply, and no new construction employment would result. This alternative would preserve options for future development, including reinstitution of a hospital use at the site.
2. A reduced-density alternative would consider various proposals for development of the site with fewer units than the proposed project, including development of unit sizes comparable to the surrounding neighborhood.
3. A two parking spaces per unit alternative would propose providing two parking spaces for each residential unit.
4. An alternate-use of the chapel alternative would entail non-residential use of the chapel structure, such as a private community center for project residents.

5. Alternative design of internal circulation and open space areas of the site would be analyzed, including elimination of the interior driveway so that the area could be used exclusively for open space.

MANDATORY FINDINGS OF SIGNIFICANCE :

	<u>YES</u>	<u>NO</u>	<u>DISC</u>
1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<u> </u>	<u> X </u>	<u> </u>
2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?	<u> </u>	<u> X </u>	<u> </u>
3. Does the project have the possible environmental effects which are individually limited, but cumulatively considered? (Analyze in the light of past projects, other current projects, and probable future projects?)	<u> </u>	<u> X </u>	<u> </u>
4. Would the project cause substantial adverse human beings, either directly or indirectly?	<u> </u>	<u> X </u>	<u> </u>
5. In there serious public controversy concerning the possible environmental effect of the project?	<u> X </u>	<u> </u>	<u> X </u>

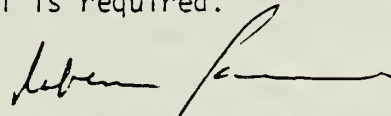
The Department of City Planning and the project sponsor met with about 70 neighborhood residents on October 5, 1982 concerning the proposed project. Areas of environmental concern identified by residents at that meeting include the density of the project and resulting increased parking demand, traffic, noise, and demand for recreational services. In addition to the issues above, some concern was voiced regarding the use of the chapel for residential construction at another meeting with about 10 neighborhood residents held by the project sponsor on July 21, 1982.

On the basis of this initial evaluation:

_____ I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Department of City Planning.

_____ I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because the mitigation measures, numbers_____, in the discussion have been included as part of the proposed project. A NEGATIVE DECLARATION will be prepared.

✓
_____ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.



Robert W. Passmore
Assistant Director-Implementation

for

Dean Macris
Director

Date: 10/21/82

APPENDIX B: BEDROOM AND UNIT MIX AND POPULATION PER HOUSEHOLD

TABLE B-1: BEDROOM AND UNIT MIX

<u>Building</u>	<u>Number of Units By Bedroom Count</u>						<u>Total</u>
	<u>2 Bedrooms</u>	<u>1 Bedroom Townhouse</u>	<u>1 Bedroom With Den</u>	<u>1 Bedroom</u>	<u>1 Bedroom Townhouse</u>	<u>Studio</u>	
Hospital	-	-	16	84	4	8	112
Convent	4	-	-	30	-	-	34
Chapel	3	2	-	1	-	1	7
New Construction	<u>18</u>	<u>-</u>	<u>-</u>	<u>18</u>	<u>11</u>	<u>-</u>	<u>47</u>
TOTAL UNITS	25	2	16	133	15	9	200

Average Number of Bedrooms Per Unit = 1.12. Studios are counted as one-bedroom units.

Percentage of Units By Bedroom:	1 Bedroom Units	83.0 % (166 units)
	2 Bedroom Units	12.5 % (25 units)
	Studio Units	4.5 % (19 units)
		<u>100.0 %</u>

SOURCE: Kaplan/McLaughlin/Diaz and Environmental Science Associates

APPENDIX B: POPULATION PER HOUSEHOLD

There is no precise method of predicting population per household (or unit) for a new residential development. Population per unit is based on a variety of factors, among which are the number of bedrooms per unit, the size and purchase price of a unit, and current market conditions such as vacancy and interest rates. Sources for estimating population per household are marketing/real estate brokerage firms, population per unit at other residential complexes, and the U.S. Census. Based on the following sources, the population per household at the Park Hill project is estimated to range between 1.5 to 1.75 persons, for a total project population of 300-350 persons.

Real Estate Brokerage Firms: The real estate brokerage firm of TRI would be the proposed leasing agent for the project. TRI estimates that the population per household at the Park Hill project would be 1.5 persons. This estimate is based on observations of the current purchasers of units of a similar size and quality. Park Hill would have about 83% one-bedroom containing an average of 700 sq. ft. of floor area. The estimate of 1.5 persons would result in a project population of 300 persons. Susan McBride, Leasing Agent, TRI Real Estate Brokers, telephone communication, February 22 and 28, 1983;

Other Residential Complexes: Property Managers at two San Francisco complexes, Diamond Heights Village and Telegraph Landing, provided estimates of one person per studio unit, an average of 1.5 persons per one-bedroom unit, and an average of 2.5 person per two-bedroom unit. Based on these averages and the expected unit mix at the proposed Park Hill project (see Table B-1, p. 248), the total project population would be about 320 persons. (Les Yoshino, Property Manager, Diamond Heights Village, telephone communication, February 28, 1983; and Ted Schneider, Manager, Telegraph Landing, telephone communication, February 28, 1983).

U.S. Census: The project is located in Census Tract 170, bounded by Duboce Ave. to the north, 17th St. to the south, Castro St. to the east, and Upper Terrace to the west. For Tract 170, the 1980 U.S. Census reports a median household size of 1.6 persons and a mean household size of 1.75 persons. The upper range of 350 is based on the U.S. Census mean person per household figure of 1.75.

APPENDIX C: CHRONOLOGY OF MEETINGS WITH RESIDENTS OF THE BUENA VISTA NEIGHBORHOOD

The following is a list of dates of meetings held by the Department of City Planning with residents of the Buena Vista neighborhood, and community concerns raised at those meetings that were applicable to the EIR.

Meeting No. 1: October 5, 1982

No. of Neighborhood Residents Attending: 68

Major Concerns Raised Pertinent to the EIR:

- Removal of steps on Park Hill Ave.
- Size and cost of the units in the proposed project.
- Number of bedrooms per unit.
- Demolition of the hospital complex in favor of subdivision of the site into single-family lots.
- Impacts on Buena Vista Park.
- Provision of on-site recreation for project residents.
- Provision of two on-site parking spaces for each residential unit.
- Density of the project compared with the density of the existing neighborhood; development of the site with fewer than 200 units.
- Examination of a comparable residential project in San Francisco to determine parking at the Park Hill Residential project.

Meeting No. 2: January 24, 1983

No. of Neighborhood Residents attending: 7

Major Concerns Raised Pertinent to the EIR:

- Cumulative analysis in the EIR of the College of Nursing project as approved by the City Planning Commission.
- Population assumption of 300 in the Initial Study should be increased.
- Accident hazards in the site vicinity.
- Height and scale of new construction including the loss of an 18-inch cypress tree.
- Historic designation of the site.

Meeting No. 3: February 23, 1983

No. of Neighborhood Residents Attending: 13

Major Concerns Raised Pertinent to the EIR.

- Daytime parking demand.
- Parking Demand attributable to Buena Vista Park seasonal fluctuation in demand for parking.
- Construction haul truck routes.
- Ingress and egress from the project site.
- Change in existing parking and circulation attributable to the project.
- Cumulative transportation analysis of One Baker St., an 18-unit condominium development in the project vicinity.
- Cumulative impacts of the project and College of Nursing.
- Steepness of grade on major access routes to the site; lines-of-site obstruction.
- Areas of available parking which is not preferred parking by neighborhood residents due to steepness of slope.

NOTE: In addition to the meetings listed above, the Office of Environmental Review received about 24 letters from neighborhood residents expressing opinions and concerns about the project. These letters are on file and available for public review at 450 McAllister, 5th floor.

APPENDIX D: SHADOWS

Shadow patterns of existing buildings and proposed construction were calculated with the Bennet Sun Angle Chart, the topographic survey of the St. Joseph's Hospital site performed by Philip B. Lygren Site Engineering, Inc. in 1969, and an enlargement of the U.S.G.S. 7.5 minute San Francisco North topographic map. The Bennet Sun Angle Chart shows the solar azimuth (relative to true north) and the solar altitude for 20 times per year including the shortest and longest days (December 22 and June 21). San Francisco Datum elevations were used to project all shadows except those cast from higher terrain located outside the area of the site topographic study (San Francisco Datum is 8.6 ft. higher than Mean Sea Level). Mean Sea Level datum was used to project shadows from higher terrain.

APPENDIX E: TRANSPORTATION, CIRCULATION AND PARKING (referenced on pp. 52-63)

Trip generation, parking demand, and transit ridership differ somewhat among residential developments (townhouses, condominiums and apartment buildings) and are influenced by a number of factors. The number of residents per unit, number of working adults per unit, auto ownership, and location with respect to proximity to transit stops, the quality and frequency of transit service, proximity to shopping, and employment are some of these variables. It is not feasible to predict or assess each of these variables for a given project, nor is it possible, by surveying additional other similar projects to determine precisely the dependence of transportation demands on these variables.

TRIP GENERATION

The assumed factors of 7 weekday person trip ends and 0.7 p.m.-peak-hour person trip ends per unit were based on trip generation at the Lake Merced condominium complex in San Francisco and are midrange in the results of 37 surveys by Caltrans (District 4) of condominium, townhouse, and apartment complexes (see note /4/ on p. 61). The assumed factors were within 30% of the factors at most of these surveyed developments. The person trip rates were derived from the vehicle rates (5.7 vehicle trips ends per unit) adjusted by automobile occupancy (1.27) persons per auto. The modal split distribution is based on 1970 Census data for Tract 170.

EXISTING PARKING SUPPLY/OCCUPANCY

PARKING (WEEKDAY)

Surveys of weekday parking occupancy were conducted on Monday, August 9 and Friday, August 13th, 1982 at 4:00 and 6:00 p.m., and on Tuesday, September 14, 1982 at 9:00 p.m. (see note /5/ on p. 35). During the day (before 6:00 p.m.), weekday parking demand along the Buena Vista Ave. East frontage of the site is generated primarily by the 60 employees of Children's Hospital who currently work at the site. Of the 46 perpendicular parking spaces on Buena Vista Ave. along the project side of the street, 25 were occupied at

4:00 p.m.; at 6:00 p.m. 10 spaces were occupied; and at 9:00 p.m. 2 spaces were occupied. On the north side of Buena Vista Ave. East, 3 of about 20 spaces were occupied at 4:00 p.m. and 2 vehicles remained at 6:00 p.m. By early evening (6:00 p.m.), there were 69 vacant spaces (or about 28 occupied spaces) among the approximately 97 curbside spaces on both sides of Buena Vista Ave. East and Park Hill Ave. along the project site frontages. Five of the 18 angle parking spaces in front of the College of Nursing were occupied at 6:00 p.m. and 3 were occupied at 9:00 p.m. (see Figures E-1 and E-2, pp. 256 to 257).

Weekday surveys of the 130 curbside spaces along residential frontages within 1 block of the site (in front of or across the street from residences) were also conducted. At 4:00 p.m., available spaces were about 55% occupied. The overall occupancy of these spaces increased to about 65% by 6:00 p.m. By 9:00 p.m. approximately 70% of the curbside spaces along residential frontages were occupied.

PARKING (WEEKEND)

Weekend parking demand in the project vicinity is generated primarily by neighborhood residents and their guests, and by visitors of Buena Vista Park, north of the site. Surveys of curbside parking spaces were conducted at 4:00 p.m. on Sunday, August 15, and on Sunday, September 26, 1982 (see note /5/ on p. 35). On Sunday afternoon, August 15th, 15 out of 66 available parking spaces were occupied at the project site frontage on Buena Vista Ave. East just west of Park Hill Ave. (23% occupancy); this parking was attributable to visitors to nearby residences. Also counted were 13 vehicles parked in the 15 spaces available on the west (project) side of Park Hill Ave.; 10 vehicles were parked in the 16 spaces available on the east side (see Figure E-3, p. 258). The 130 curbside parking spaces along all residential frontages were at 90% occupancy. (This includes all street frontages that were surveyed except for the former St. Joseph's College of Nursing and Park Hill Ave. project frontages.)

The survey conducted at 4:00 p.m. on Sunday, September 26, 1982 found less use of curbside parking in the neighborhood. On the Buena Vista Ave. East frontage of the site, 2 out of 66 on-street spaces were occupied and on the Park Hill Ave. frontage about 18 spaces were occupied out of a total of 31 spaces. Of the 130 spaces along residential frontages, occupancy at 4:00 p.m. was about 75%, with about 100 spaces filled and 40 spaces vacant. As weekend curbside parking appears to occur directly in front of or

across from residences, it can be inferred that Buena Vista Park visitors are not a very significant part of the weekend parking demand in the immediate project area. On Sunday, August 15, 1982, occupancy of parking spaces along non-residential frontage on Buena Vista Ave. East (that is, immediately in front of the project site and the Nursing College site) was 25% and along the surveyed residential frontages occupancy was 60%. This comparatively low use of Buena Vista Ave. East occurred in spite of the proximity of Buena Vista Ave. East for parking by visitors to Buena Vista Park.

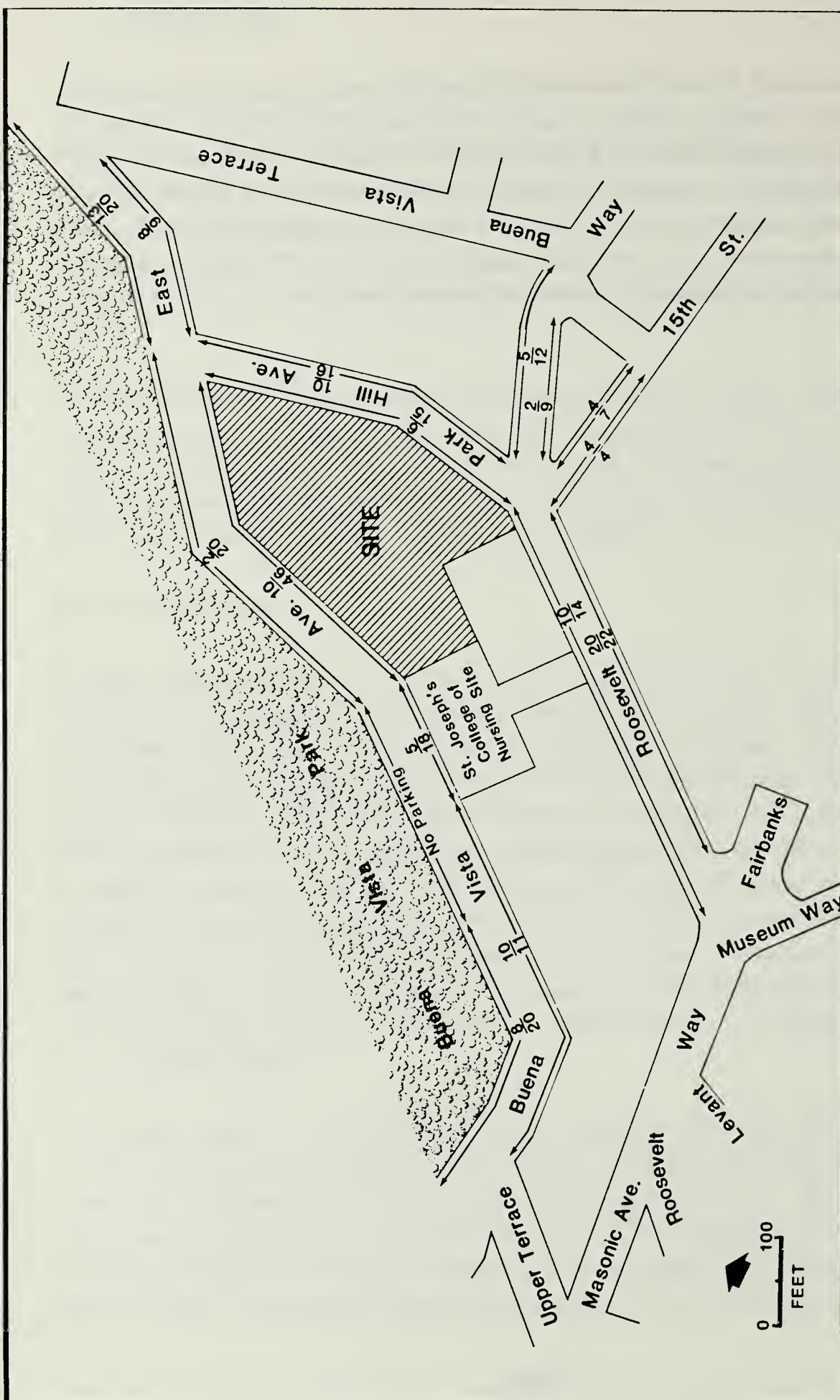
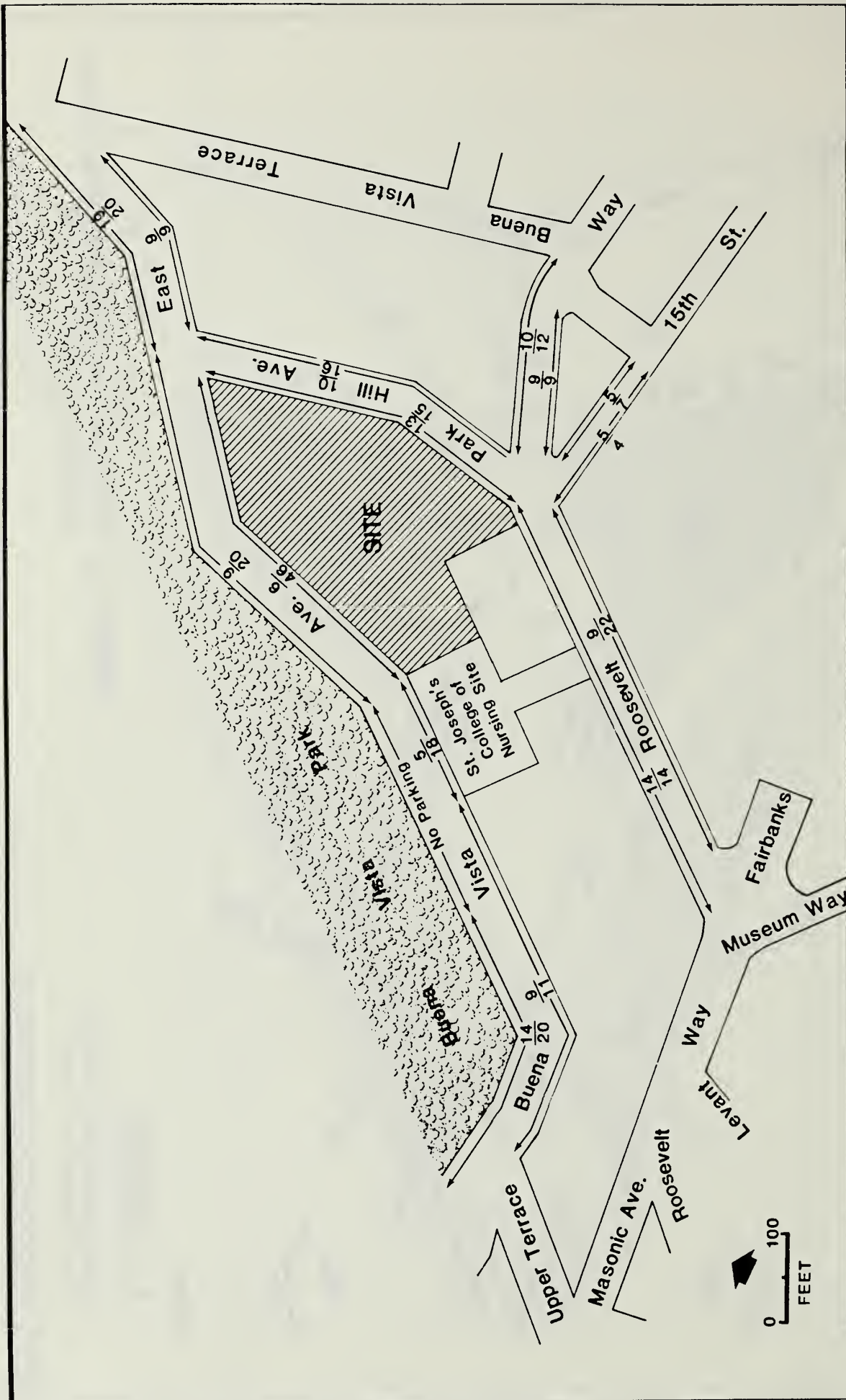


FIGURE E-1: On-Street Parking Supply and Occupancy
Weekday 6:00 P.M.

SOURCE: Environmental Science Associates, Inc.



LEGEND

6 = Occupied Spaces
40 = Total Spaces *

* Proper curbside spaces; does not include driveways or curbs

FIGURE E-3: On-Street Parking Supply and Occupancy
Sunday 4:00 P.M.

TABLE E-1: ACCIDENTS IN THE VICINITY OF THE PROPOSED PARK HILL PROJECT
(1977-81)

<u>Street</u>	<u>Section*</u>	<u>Number of Accidents</u>	<u>Accident Rate Per MVM**</u>
Buena Vista East	Buena Vista Terrace to Park Hill	5	20
Buena Vista East	Park Hill to Upper Terrace	17	20
Park Hill	Buena Vista East to Roosevelt Way	2	30 ***
Roosevelt Way	Buena Vista Terrace To Park Hill	5	10
Roosevelt Way	Park Hill to Museum Way	4	4
Roosevelt Way	Museum Way to Upper Terrace	0	-
Upper Terrace	Masonic Ave. to Buena Vista Ave. East	1	1 ***
15th Street	Roosevelt Way to Buena Vista Ave. East	0	-

* Refer to the map on p. 10

** Occurrences per million vehicle miles (MVM) on the segment.

*** Too few accidents occurred on this roadway segment for this rate to be statistically meaningful.

PARKING DEMAND STUDY

Information about parking demand at residential developments is available only on a very generalized level from standard traffic engineering reference documents. The Transportation and Traffic Engineering Handbook (Institute of Transportation Engineers, 1982) relies upon zoning and planning standards as a predictor of parking demand and cites the range of 0.3 to 2.0 spaces per dwelling unit for multi-family residential uses./1/ The Planning Code (City and County of San Francisco), requires 1 space per dwelling unit for residential uses in the St. Joseph's Hospital area (it does not distinguish between single-family and multi-family)./2/

Parking demand at residential developments is a function of several variables, foremost of which is auto ownership by residents. Proximity to transit lines and the amount of visitor travel are also variables in the demand function. Auto ownership can be related to family size and age, to number of family members employed outside of the home and, generally, to income levels. As very little is known about the future residents of the potential Park Hill Residential project, prediction of parking demand based on prediction of auto ownership of the potential residents would not be valid. Visitor parking demand is an almost intangible variable that cannot be reliably predicted based solely upon the published information available.

Parking demand, like other traffic engineering functions, can be based on empirical (measured) data. The procedure employed to compile a data base consists of identifying analogous sites, designing adequate survey techniques, making field surveys to collect data, and averaging the collected data into a statistical predictor of demand. Both the parking demand model and the trip generation model used in this EIR rely upon empirical data compiled using the above process. The two most important aspects of the procedure are to identify analogous sites and to design the field surveys to encompass all of the identifiable demand (both resident and guest) at each site.

In the case of the Park Hill Residential project, there are three items that can be used to identify analogous sites: unit mix (the number of bedrooms per unit), unit price, and proximity to transit. A study of 56 multi-family residential developments (both apartments and condominiums) in the San Francisco Bay Area and Sacramento Valley has been published by TJKM, Transportation Consultants./3/ The information in the study can be used as a reasonable indication of parking demand at multi-family residential uses in general. However, none of the survey locations in the study are in San Francisco, nor are any of the study sites located near transit service similar to the Muni.

To make a more precise estimate of parking demand from the Park Hill Residential project, a study was commissioned to identify parking demand (expressed in terms of spaces per unit) at multi-family residential developments in San Francisco that could be considered analogous to the Park Hill Residential project. A total of nine market-rate condominium complexes in San Francisco were evaluated as potential study sites by three transportation professionals./4/ The potential sites included: Opera Plaza, The Galleria, 101 Lombard, Golden Gateway, Victoria Mews, Lake Merced Village, The Grove, Telegraph Landing, and Diamond Heights Village.

The primary criteria used to evaluate the four sites were:

- Comparable location (including proximity to public transit service);
- Comparable total number of units and number of bedrooms per unit;
- Total number of units that would yield a statistically significant sample;
- Ability to distinguish and separate parking demand attributable to the study site from parking demand attributable to nearby residences and other uses; and
- Comparable selling prices.

As a result of the evaluation, it was decided that analysis of two comparable study sites (as opposed to one site) would provide the most reliable estimate of parking demand for the Park Hill Residential project. The two sites that were selected are Telegraph Landing, located at 150 Lombard St., and Diamond Heights Village, located at 115 Red Rock Way.

Opera Plaza, the Galleria, and 101 Lombard were eliminated as potential sites because, as of late October 1982, they were not sufficiently occupied to provide an adequate sample of residents' parking demand. The Golden Gateway complex did not provide a comparable location because it is situated in the core of the downtown financial district. Victoria Mews, located in the Potrero Hill neighborhood, contains condominiums and office space; this project was not selected because it is not possible to reliably separate parking demand of the office space or adjacent residences from parking demand of Victoria Mews' residents. Lake Merced Village was eliminated because of its suburban location. The Grove was considered a good comparison site because of its comparable location and mix of units. However, this 88-unit project was eliminated because a site containing less than about 100 units would not yield a statistically significant sample.

Telegraph Landing, containing 189 units, was found to be an adequate comparison site. It met all five selection criteria. The ability to separate demand from a nearby health facility, the Bay Club, and nighttime restaurant uses was of concern. However, it was determined that parking demand from these adjacent uses could be adequately separated from the parking demand associated with the Telegraph Landing project. The proximity of Telegraph Landing to uses in the downtown was thought to be a potential factor in the applicability of study data that might be collected at the complex. Since the level of transit service in the Telegraph Landing area was determined to be roughly equivalent to the transit available in the Park Hill area, the Telegraph Landing site was accepted as a survey site on the premise that the Telegraph Landing observations would not be used if the data proved to be completely dissimilar from the data collected at the other survey site.

Diamond Heights Village was also chosen as a suitable study site. Although not all of the units at Diamond Heights Village are owner-occupied, the size (396 units), location, and site layout of Diamond Heights Village made it an excellent choice.

Wilbur Smith and Associates (WSA) was selected to conduct the study at the two sites. WSA prepared a technical report on their findings which is on file with the Office of Environmental Review, 450 McAllister Street, Fifth Floor, San Francisco, CA. Following is a synopsis of the report and a discussion of how the results of that study were used in the EIR.

At each of the two study locations, WSA identified adjacent and nearby on-street parking that was used by residents and guests of each complex. Interviews were held with the Telegraph Landing Community Manager and a representative of the Diamond Heights Village property management firm, Hanford Freund and Company, to obtain specific information regarding the number and kind of units provided, parking supply and policies, number of occupied units, as well as general information and observations regarding local parking characteristics. This information was used to estimate the scope of the parking surveys to be performed. Field surveys were performed by WSA professionals and technicians at the two study sites on three separate nights, listed in Table E-2 below.

The time periods for the field surveys were selected to match the periods of peak parking demand from both residents and guests. During each of the surveys, the number of empty parking spaces in the off-street garages on each site were recorded as were the license numbers of vehicles parked on-street in the survey areas. The collected data was analyzed to determine total (resident and guest) parking demand and effective on-street demand. Effective on-street parking demand was derived by subtracting the total number of cars parked inside garages from the total observed parking demand, and thus includes both resident and guest parking.

Table E-3 shows the results of the parking surveys and shows the totals and averages for each complex. Total parking demand at Diamond Heights Villages ranged from 0.69 spaces per unit to 1.0 spaces per unit. The greatest total parking demand occurred consistently during the early morning survey. If it is assumed that guest parking occurred only during the evening, this indicates that the presence of guests' vehicles during the evening was outweighed by the absence of residents' vehicles during this same period. The effective on-street parking demand observed during the evening and mornings surveys were nearly equal.

At Telegraph Landing, the total observed parking demand ranged from 0.99 spaces per unit to 1.13 spaces per unit, with the greatest demand occurring during the evening surveys. The impact of guest parking (on a space per unit basis) was more dramatic at Telegraph Landing. The range of 0.30 to 0.48 spaces per unit of effective on-street demand probably reflects some parking not associated with Telegraph Landing.

TABLE E-2: PARKING SURVEY DATA COLLECTION TIMES

<u>Study Site</u>	<u>Date</u>	<u>Day of the Week</u>	<u>Time</u>
Telegraph Landing	Nov. 19-20, 1982	Fri, Sat	9:30-10:30PM; 6:30-7:00AM
	Nov. 22-23, 1982	Mon, Tues	9:00-10:00PM; 12:01-1:00AM
	Nov. 30, 1982 - Dec. 1, 1982	Tues, Wed	6:30-8:30PM; 12:01-1:00AM
Diamond Heights Village	Nov. 19-20, 1982	Fri, Sat	7:30-9:00PM; 5:30-6:30AM
	Nov. 22-23, 1982	Mon, Tues	8:00-9:00PM; 1:00-2:00AM
	Nov. 30, 1982- Dec. 1, 1982	Tues, Wed	9:30-11:00PM; 1:00-2:00AM

SOURCE: Wilbur Smith and Associates

According to the traffic engineers conducting the study, the Telegraph Landing results may be considered conservative (i.e. greater than actual) because of the "outside" influence from nearby land uses which could not be completely separated out. A higher range of observed parking demand was evident at Telegraph Landing than at Diamond Heights Village. Diamond Heights is isolated from other (different) land uses, and thus the parking survey results were most likely not influenced by other uses, as the Telegraph Landing survey results may have been. The proximity of Telegraph Landing to downtown attractions did not appear to affect the parking demand for the complex as the observed rate is essentially equivalent to the rate observed at Diamond Heights Village. Thus the total parking demand rates (in spaces per unit) observed at both study locations would be applicable as predictors of demand at the Park Hill Residential Project.

On-street parking demand as calculated in these surveys, may not be entirely applicable to the Park Hill Residential Project as on-street demand is a close function of garage operation and the allocation of garage space to project residents or guests. If, for example, the spaces in an on-site garage are reserved for resident use only, then all visitors would have to park on-street. If residents are assigned one space per unit and the

TABLE E-3: OBSERVED PARKING DEMAND AT DIAMOND HEIGHTS VILLAGE AND TELEGRAPH LANDING

		<u>Parking Demand</u>		<u>Total Demand</u>	<u>Effective</u>
		<u>Total Observed</u>	<u>Percent On-street</u>	<u>(Spaces Per Unit)</u>	<u>On-street Demand**</u>
					<u>(Spaces Per Unit)</u>
<u>Diamond Heights (396 units)</u>					
AM Surveys	11/20/82	396	25%	1.00	0.25
(12:01-1:00AM)	11/23/82	391	21%	0.99	0.20
	12/01/82	395	21%	1.00	0.21
	Average			0.99	0.22
PM Surveys	11/19/82	272	30%	0.69	0.21
(9:00-10:00PM)	11/22/82	316	25%	0.80	0.20
	11/30/82	360	22%	0.91	0.20
	Average			0.80	0.20
<u>Telegraph Landing (189 units)</u>					
AM Surveys	11/20/82	188	20%	0.99	0.22
(1:00-2:00AM)	11/23/82	197	21%	1.04	0.22
	12/01/82	199	22%	1.05	0.23
	Average			1.03	0.22
PM Surveys	11/19/82	202	35%	1.07	0.37
(8:00-9:00PM)	11/22/82	193	30%	1.02	0.30
	11/30/82	213	42%	1.13	0.48
	Average			1.07	0.38

*Total Demand is both on-street and off-street parking demand.

**Effective on-street demand (included in total demand) represents that fraction of the total demand observed to be parking on-street

SOURCE: Wilbur Smith and Associates

surplus garage spaces are reserved for visitor use only, the on-street demand would consist of residents vehicles (for those units with more than one auto) and overflow guest vehicles. Conversely, if none of the garage spaces were assigned or reserved (i.e., open to both guests and residents), on-street parking might be expected to be less than would occur in the other two examples.

The average peak demand for the two complexes ranged from 0.99 spaces per unit to 1.07 spaces per unit. This range was used to estimate parking demand at the Park Hill Residential project. A similar estimate of parking demand was also made using the TJKM data from the 56 suburban locations. A range of demands has been analyzed rather than choosing a single demand averaging the San Francisco and suburban data. The San Francisco data has been assumed to represent the lower end of the parking demand range and the suburban data has been assumed to represent the upper end of the range. Parking demand from the Park Hill Residential project would, most likely, fall within the range analyzed.

NOTES - Appendix E - Parking Demand Study

/1/ Institute of Transportation Engineers, 1982, Transportation and Traffic Engineering Handbook, Table 21-1, p. 647.

/2/ City and County of San Francisco, 1979, Planning Code, Article 1.5, Sec. 151, Table 4, p. 60

/3/ A compilation of studies during 1978-82 of parking demand at 56 multi-family residential complexes was made by TJKM Transportation Consultants.

/4/ The persons involved in the selection were: Frederick C. Dock (registered traffic engineer, California certificate TR001129) of Environmental Science Associates, Inc., John Maunder of TJKM Transportation Consultants, and Linda Tiebloom of Wilbur Smith and Associates.

APPENDIX F: ENERGY (referenced on pp. 38 and 67)

California Administrative Code Title 24 (Energy Building Regulations for New Residential and Nonresidential Buildings) standards apply to all new construction initiated in California after July 1, 1978. Enacted at the state level to answer public concern over real energy shortages and rising energy prices, the law is enforced at the local level through the building permit required for all construction. Title 24 provides two methods of compliance: prescriptive and performance standards. Before a building permit can be issued, a licensed engineer must certify the building's compliance with Title 24. If local governments fail to enforce the Title 24 regulations properly, the State may, after proper notice, take enforcement action.

Section 31.26(e), Chapter 3, San Francisco City Administrative Code. The Code requires that the following information about the energy performance of a project be provided in each environmental impact report prepared by the City: connected electrical load, electricity and fossil fuel consumption, and building energy budget. A discussion of measures to mitigate energy consumption is also required.

Citizens' Energy Policy Advisory Committee (CEPAC). Pursuant to a resolution of the Board of Supervisors, the Citizens' Energy Policy Advisory Committee was appointed by the Mayor in 1981 to study energy-related problems and opportunities in the City, and to make recommendations concerning energy conservation for the entire city.

The second, and final, report of CEPAC contains recommendations for energy conservation for the residential, commercial, and industrial sectors, which account for about 95% of the conventional energy supplies consumed in San Francisco each year. Many of CEPAC's recommendations have been adopted by the City in the new Energy Element of the Comprehensive Plan.

Energy Element, San Francisco Comprehensive Plan. (June 3, 1982). This Plan contains policies to:

- assure reliable and affordable energy supplies in the City;
- improve the City's ability to respond to a fuel or power emergency;
- reduce building energy consumption;
- increase energy efficiency of transportation; and
- increase use of alternative energy technologies and renewable energy sources.

